

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

Exigent Landscaping, LLC  
*dba* Exigent Design and Build,

Debtor.

Bankruptcy Case No. 23-46912-tjt  
Judge Thomas J. Tucker  
Chapter 7

**FIRST AND FINAL FEE APPLICATION OF ATTORNEY  
FOR THE DEBTOR FOR SERVICES RENDERED FROM  
AUGUST 7, 2023 THROUGH FEBRUARY 12, 2024**

NOW COMES Stevenson & Bullock, P.L.C. (“S&B” or the “Applicant”), counsel for Exigent Landscaping, LLC *dba* Exigent Design and Build (the “Debtor”), who submits this First and Final Fee Application for Attorney for the Debtor for Services Rendered from August 7, 2023 through February 12, 2024 (the “Application”) incurred in representing the Debtor pursuant to, *inter alia*, 11 U.S.C. § 330, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and Rule 2016-1 of the Eastern District of Michigan Local Bankruptcy Rules. In Support thereof, Applicant states:

**INTRODUCTION**

This Application is filed seeking approval of Applicant’s fees and expenses incurred during the pendency of this highly contested and difficult Chapter 11 Case. Importantly, Applicant is maintaining \$90,916.79 in its IOLTA account of funds provide by Ronald F. Heitmann (collectively, the “S&B Funds”). The S&B Funds are not property of the bankruptcy estate because the S&B Funds did not come from the Debtor or the Debtor’s assets and, therefore, have no impact on the bankruptcy estate

as a whole. Any reduction of the fees and expenses requested in this Application would not result in a recovery to creditors of the bankruptcy case as the S&B Funds are not property of the estate. Applicant's efforts have been substantial. Accordingly, Applicant submits that approval of this Application is appropriate.

This is the First and Final Fee Application for counsel for Debtor and the firm Stevenson & Bullock, P.L.C.

### **APPLICATION**

1. S&B seeks compensation totaling \$111,210.21 (the "Fees"). This amount consists of (i) fees totaling \$108,434.00 representing 260.20 hours of service by counsel at S&B's hourly rates; and (ii) expenses paid by S&B totaling \$2,766.21. Applicant is holding the S & B funds in its IOLTA account exclusively for use for Applicant's approved fees and expenses.

2. This Application covers the period August 7, 2023 through February 12, 2024 (the "Fee Period").

3. The services rendered by the Applicant during the Fee Period have been substantial, and Applicant believes that an allowance of fees and reimbursement of expenses is appropriate and necessary at this time.

4. Applicant submits the following narrative summary, satisfying E.D. Mich. LBR 2016-1(a)(3)-(5):

**Narrative Summary.** This chapter 11 bankruptcy case was filed in an effort to preserve value for all case constituents and maximize the recovery for creditors. The Debtor was established in 2017, and its primary business is a full design

and build outdoor construction company specializing in hardscape construction and pools based in metro Detroit. The Debtor does everything from 3D designs, pools hardscaping, landscaping, patios, pergolas, and outdoor kitchens.

In 2022, the Debtor was involved in a contentious legal proceeding with former customers. Also, during that time Covid made it difficult to get material to finish existing jobs, and the material was more expensive when it was available. Though the Debtor spent considerable time and effort prior to the Petition Date attempting to remedy such matter, a Subchapter V bankruptcy became necessary.

The Debtor commenced a voluntary case under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) on August 7, 2023 (the “Petition Date”). The Debtor remained in possession of its assets and managed its business as debtor-in-possession under 1107 and 1108 of the Bankruptcy Code until the case was converted to a chapter 7 pursuant to the *Order Granting the United States Trustee’s Motion to Convert this Case to Chapter 7; Denying, Without Prejudice, the Debtor’s January 24, 2024 Sale Motion; and Cancelling the February 14, 2024 Bench Opinion Hearing and the March 27, 2024 Further Hearing on Confirmation* (the “Conversion Order”).

At the onset of the case the Debtor took immediate actions to preserve the operations of the Debtor by preparing and filing a First Day Motion for Entry of Order (A) Authorizing Debtor to Pay Employee-Obligations Payments (the “Employee Obligations Motion”) and a Motion for Entry of Interim and Final Order Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection (the “Cash

Collateral Motion”). Both the Employee Obligation Motion and the Cash Collateral Motion was granted by this Court.

Applicant counseled the Debtor and guided the company through contested and substantial issues in the Case, including, addressing issues with Debtor’s landlord, secured equipment creditors, the requests and concerns of the United States Trustee, the Debtor’s chapter 11 plan of reorganization, the United States Trustee’s motion for conversion to Chapter 7, and the possible sale of Debtor’s assets through a Court-approved auction process. Applicant’s efforts were substantial and steady through the pendency of the Case. At all times, applicant endeavored to resolve issues collaboratively and quickly.

**Case Administration/341 meeting/schedules and SOFA.** Services rendered in this category relate to communicate and correspondence with the Debtor and other parties in interest including, creditors, the Office of the United States Trustee, the Subchapter V Trustee, and other parties in interest. Services in this category also include, but are not limited to, the overall representation of the Debtor throughout the pendency of the bankruptcy case. Applicant also represented the Debtor in determinations of contested matters including the United States Trustee’s Motion to Convert.

In addition, Applicant coordinated the collection of records from the Debtor, creditors of the Estate, and other third parties. Applicant conducted a review of the records relating to secured and unsecured claims. Applicant has conducted a

substantial analysis of the Debtor's business operations and advised the Debtor regarding legal issues of importance to the underlying Case.

Services in this category also, include, the formulation of strategy by Applicant and consulting sessions with the Debtor in order to fully understand the Debtor's financial problems and prospects for a successful Chapter 11. Applicant assisted in the preparation of the petition, all schedules, and Statements of Financial Affairs, including amendments. Applicant prepared for and attended the Initial Debtor Interview as well as provided the United States Trustee documents and information in preparation for the 341 Meeting of Creditors. Applicant attended and represented the Debtor at the Chapter 11 Status Conference, as well as the First Meeting of Creditors.

**Fee/Employment Applications.** Services rendered in this category related to the drafting of the employment application for Applicant. Services rendered in this category also relate to the preparation and drafting of this Application.

**First Day Motions.** Services rendered in this category include, through are not limited to, the analysis, preparation, and prosecution of the Debtor's first day motions. Importantly, applicant assisted the Debtor in these efforts and developed a strategy at the early stages of the case for the continued operation of the Debtor and maximization of the recovery for the Estate.

On the Petition date, the Debtor filed the Employee Obligation Motion [Docket No.5]. No objections or responses were filed to the Employee Obligations Motion and the Court entered *an Order (A) Authorizing Debtor to Pay Employee Obligations; and (B) Directing Financial Institutions to Honor Outstanding Employee-*

*Obligation Payments* [Docket No. 17]. Further, on the Petition Date, the Debtor filed the Cash Collateral Motion. No objections or responses were filed and the Court entered the *Order Granting the Debtor's Frist Day Motion for Entry of an Interim and Final Order Authorizing the Debtor to Use Cash Collateral and Granting Adequate Protection* [Docket No. 18].

**Chapter 11 Plan.** Services rendered in this category related to the drafting and preparation of the Plain of Reorganization of Exigent Landscaping, LLC *dba* Exigent Design and Build (the "Plan"). Services rendered in this category also relate to negotiating with equipment vendors and landlord regarding Plan treatment, and addressing by the Plan objections by the Internal Revenue Service, the United States Trustee and Creditor, Mohammad Saad.

**Adversary Proceedings.** Services rendered in this category related to the adversary proceeding filed against the Debtor by Ayham and Maria Ashkar ("Adversary Proceeding"). The Adversary Proceeding was brought under 11 U.S.C. § 523. In response, Applicant prepared Defendant's Motion to Dismiss Adversary Complaint to Determine Dischargeable of Debt with Prejudice.

**Sale, Realization, and Liquidation of Estate Property** Services rendered in this category relate to, without limitation, the sale of the Debtor's assets pursuant to the Debtor's Motion for (A) an Order (I) Establishing Bidding Procedures for the Sale of substantially All of the Debtor's Assets; (II) Approving Form and Manner of the Sale and Other Notices; and (III) Scheduling an Auction and a Hearing to consider the

Approval of the Sale; (B) Order Approving the Sale of the Debtor's Assets Free and Clear of liens, Claims and Encumbrances; and (C) Certain Related Relief .

**The Motion to Convert.** On November 16, 2023, the UST filed a Motion to Convert the Case from Chapter 11 to Chapter 7 ("Motion to Convert") [Docket No. 91] to which the Debtor opposed [Docket No. 125]. The Debtor worked diligently with the UST and the Subchapter V Trustee to resolve the issues raised the Office of the United States Trustee in the Motion to Convert. However, the parties were not able to resolve the issues and the Court held a hearing on the Motion to Convert. On February 12, 2024, this Court entered the *Order Granting the United States Trustee's Motion to Convert This Case to Chapter 7; Denying without Prejudice, the Debtor's January 24, 204 Sale Motion; and Cancelling the February 14, 2024 Bench Opinion hearing and the March 27, 2024 Further Hearing on Confirmation* ("Conversion Order").

**Claims Administration.** Services rendered in this category relate to the analysis, review, and management of proofs of claim as well as the claims administration allowance process.

4. As required by E.D. Mich. LBR 2016-1(a)(4), there are adversary proceedings, state or other federal litigation or administrative proceedings in which Applicant is or was involved.

5. As required by E.D. Mich. LBR 2016-1(a)(5), the Chapter 11 case has been converted to a Chapter 7 case as of the 12<sup>th</sup> day of February, 2024.

6. As required by E.D. Mich. LBR 2016-1(a)(6), this Honorable Court did not enter an Order Confirming the Plan but instead entered the conversion Orders.

7. As required by E.D. Mich. LBR 2016-1(a)(7), Applicant is unaware of any accrued unpaid administrative expenses other than the fees and expenses of the Subchapter V Trustee.

8. As required by E. D. Mich. LBR 2016-1(a)(8), Applicant does not believe that there are instances in which an award is sought for the services of more than one professional and paraprofessional.

9. As required by E.D. Mich. LBR 2016-1(a)(9), this is Applicant's First and Final Fee Application.

10. As required by E.D. Mich. LBR 2016-1(a)(10), Applicant forwarded this application in its entirety to Debtor for review and Applicant has received a response relating to the requested fees and expenses.

11. Pursuant to E.D. Mich. LBR 2016-1(a), Applicant has attached hereto the following exhibits:

Exhibit 1 - A copy of the proposed Order Authorizing First and Final Application of Attorney for the Debtors for Services Rendered from August 7, 2023 through February 12, 2024

Exhibit 2 – Employment Order

Exhibit 3 - Summary of the number of hours of services rendered by each attorney/paralegal and the hourly rate of each.

Exhibit 4 - Itemized time records in chronological order, of each specific service for which an award of compensation is sought. These time records



indicate (I) the date each service was rendered; (ii) a description with particularity of the services rendered; (iii) identification of the attorney/paralegal who performed the services; and (iv) the time spent performing the service.

Exhibit 5 - A brief biographical statement of the professional experience of each attorney/paralegal for whom an award of compensation is sought.

Exhibit 6 - An itemized statement of disbursements for which an award of compensation is sought.

**WHEREFORE**, Applicant prays that it be awarded final fees in the amount of \$108,434.00 and expenses in the amount of \$2,776.21 for a total of \$111,210.21.

Respectfully submitted,  
**STEVENSON & BULLOCK, P.L.C.**

By: /s/ Ernest M. Hassan, III  
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Dated: March 1, 2024

**EXHIBIT “1”**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

Exigent Landscaping, LLC  
*dba* Exigent Design and Build,

Debtor.

Bankruptcy Case No. 23-46912-tjt  
Judge Thomas J. Tucker  
Chapter 7

**ORDER AUTHORIZING FIRST AND FINAL APPLICATION OF  
ATTORNEY FOR THE DEBTORS FOR SERVICES RENDERED FROM  
AUGUST 7, 2023 THROUGH FEBRUARY 12, 2024**

This matter having come before the Court on the First and Final fees for attorneys for the Debtors, Stevenson & Bullock, P.L.C. for Services Rendered Between August 7, 2023 through February 12, 2024 in the amount of \$108,434.00 and reimbursement of expenses in the amount of \$2,776.21 for a total request of \$111,210.21, the Application with attached Exhibits having been filed with the Court and a Notice having been served upon all parties pursuant to E.D. Mich. LBR 9014-1 and Rule 2002(a)(7) of the Federal Rules of Bankruptcy Procedure, no objections to the Application having been received within the time specified in the Notice, the Court having considered the Application and being fully advised in the premises:

**IT IS HEREBY ORDERED** that the APPLICATION is GRANTED;

**IT IS HEREBY FURTHER ORDERED** Stevenson & Bullock, P.L.C., is hereby awarded First and Final Fees in the amount of \$108,434.00 and reimbursement

of expenses in the amount of \$2,776.21 for a total award of \$111,210.21 (collectively the “Award”).

**IT IS HEREBY FURTHER ORDERED** that the funds being held on hand in the Stevenson & Bullock, P.L.C. IOLTA account shall be used to satisfy the above Award.

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

Exigent Landscaping, LLC  
dba Exigent Design and Build,

Debtor.

Bankruptcy Case No. 23-46912 - tjt  
Judge Thomas J. Tucker  
Chapter 7

**NOTICE OF FIRST AND FINAL FEE APPLICATION OF ATTORNEY FOR THE DEBTORS FOR  
SERVICES RENDERED FROM AUGUST 7, 2023 THROUGH FEBRUARY 12, 2024**

**PLEASE TAKE NOTICE** that Ernest M. Hassan, III and the firm Stevenson & Bullock, P.L.C. (collectively "Applicant"), as bankruptcy counsel for the Debtors, have filed a First and Final Fee Application. Debtors case is pending.

A. Applicant is requesting fees for professional services in the amount of \$107,042.00.  
B. Applicant is requesting expenses in the amount of \$2,776.21.  
C. Pursuant to E.D. Mich. LBR 2016-1(a)(1)(C), there are no funds on deposit that are property of the estate. Applicant is maintaining \$90,916.79 in its IOLTA account of funds provide by a third party; the funds did not come from the Debtor or the Debtor's assets.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the Application, within 21 days from the date of service of this Notice, you or your attorney must:

1. File with the court a written response or an answer\*, explaining your position at:

United States Bankruptcy Court, 211 W. Fort Street, 21<sup>st</sup> Floor, Detroit, MI 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must also mail a copy to:

Office of the U.S. Trustee 211 W. Fort Street, Suite 700 Detroit, MI 48226	Ernest M. Hassan, III 26100 American Dr., Suite 500 Southfield, MI 48076
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2.If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief.**

Respectfully submitted,  
**STEVENSON & BULLOCK, P.L.C.**

By: /s/ Ernest M. Hassan, III (P67815)  
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Dated: March 1, 2024

\*Response or answer must comply with FED .R. CIV. P. 8(b), (c) and (e).

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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**PROOF OF SERVICE**

**Ernest M. Hassan, III** hereby certifies that on the 1<sup>st</sup> day of March, 2024, that a copy of the **First and Final Fee Application of Attorney for the Debtor for Services Rendered from August 7, 2023 through February 12, 2024, Notice of First and Final Fee Application of Attorney for the Debtor for Services Rendered from August 7, 2023 through February 12, 2024** and this **Proof of Service** were served upon all parties listed below, electronically and/or by depositing same in a United States Postal Box located in Southfield, Michigan, with postage fully prepaid thereon.

United States Trustee's Office	All parties requesting service via the Court's Electronic Case Filing System.
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In addition, a copy of the **Notice of First and Final Fee Application of Attorney for the Debtor for Services Rendered from August 7, 2023 through February 12, 2024** was served on each and every party listed on the Debtor's matrix obtained from PACER on the 1<sup>st</sup> day of March, 2024 which is attached to this Proof of Service.

Respectfully submitted,  
**STEVENSON & BULLOCK, P.L.C.**

By: /s/ Ernest M. Hassan, III  
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Label Matrix for local noticing  
0645-2  
Case 23-46912-tjt  
Eastern District of Michigan  
Detroit  
Fri Mar 1 07:27:06 EST 2024

AG Gas Service  
27231 Doxtator  
Dearborn Heights, MI 48127-4903

Ally Bank c/o AIS Portfolio Services, LLC  
4515 N. Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

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J&H Transporation Co.  
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Sterling Heights, MI 48310-4122

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Jennifer Hernandez  
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Joe Hebeka and Angela Hebeka  
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Utica, MI 48316-5394

Joe Regalado  
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Law Office of Anthony Wayne Kahn  
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Farmington, MI 48336-3120

Kelley Wallis  
5818 Carmen Court East  
West Bloomfield, MI 48324-2912

Kelsey Acho  
32721 White Oaks Trail  
Franklin, MI 48025-2563

Kirk, Huth, Lange & Badalamenti, P.L.C.  
19500 Hall Rd #100  
Clinton Township, MI 48038-5317

Kristen Toma  
20652 Breezeway Dr.  
Macomb, MI 48044-3518

Lee Cameron  
49337 Marte  
New Baltimore, MI 48047

MacAllister Machinery Co., Inc  
c/o CRF Solutions  
PO Box 1389  
Simi Valley, CA 93062-1389

Macallister Rental  
6300 South Eastern Ave  
Indianapolis, IN 46203-5828

Malek Shamaya  
19429 Gold River  
Macomb, MI 48044-4251

Marc Piper  
6970 Valley Spring Dr.  
Bloomfield Twp, MI 48301-2847

Marco  
42945 Whitestone St.  
Northville, MI 48168-2061

Maria Ashkar  
47681 Manorwood Drive  
Northville, MI 48168-8471

Matt Decoster  
37676 Huron Pointe Drive  
Harrison Township, MI 48045-2823

Matt Grant  
1200 Lone Pine Road  
Bloomfield Hills, MI 48302-2816

Matt Martin  
1422 Pueblo Court  
Milford, MI 48381-2978

Megan Madaus  
18210 Fairway Dr.  
Detroit, MI 48221-2707

Michael J. Balian  
100 W. Big Beaver Rd.  
Ste 333  
Troy, MI 48084-5283

Michele Breteton  
49876 Baker Court  
Macomb, MI 48044-1525

Michigan Department of Treasury  
Collections/Bankruptcy Unit  
P.O. Box 30168  
Lansing, MI 48909-7668

Anthony James Miller  
20700 Civic Center Drive  
Suite 420  
Southfield, MI 48076-4140

Moe Saad  
921 Crescent Drive  
Dearborn, MI 48124-1209

Mohamed Saad  
c/o Osipov Bigelman, P.C.  
20700 Civic Center Dr., Ste. 420  
Southfield, MI 48076-4155

Nacy Afr  
1085 Glengarry Circle East  
Bloomfield Hills, MI 48301-2214

Natalie Powers  
697 Sunningdale  
Grosse Pointe, MI 48236-1627

Nick Pinozzi  
55520 Whitney Ct.  
Utica, MI 48315-6668

Oakland Fuels  
3943 Airport Road  
Waterford, MI 48329-1308

Yuliy Osipov  
Osipov Bigelman, P.C.  
20700 Civic Center Drive, Ste. 420  
Southfield, MI 48076-4140

S. Thomas Padgett  
DeBrincat Padgett  
27780 Novi Road  
Suite 225  
Novi, MI 48377-3402

Partha Nadi  
3514 Pine Estates  
Bloomfield Hills, MI 48302

Pawnee Leasing Corporation  
c/o Ali  
654 Amherst Road  
Suite 320  
Sunderland, MA 01375-9420

Peterson Brothers Co.  
9680 Grineel Ave  
Detroit, MI 48213-1149

Ratnesh Mehra  
232 Forest Ave.  
Royal Oak, MI 48067-1875

Rock Bottom Stone Supply  
PO Box 190081  
Burton, MI 48519-0081

Rock Botton  
4057 S Dort Hwy  
Burton, MI 48529

Ryan Kelly  
8884 Morning Mist Dr.  
Clarkston, MI 48348-2868

SCP Distributors, LLC  
c/o Scott R. Cheatham  
Adams and Reese LLP  
701 Poydras Street, Suite 4500  
New Orleans, LA 70139-4596

SCP Pool Corp.  
35015 Glendale St.  
Livonia, MI 48150-1230

Sam Jarbo  
33717 Woodward Ave  
Ste 560  
Birmingham, MI 48009-0913

Samantha Ceislak  
1123 Hickory Ave.  
Royal Oak, MI 48073-3290

Sandra M. Kelly  
8884 Morning Mist Dr.  
Clarkston, MI 48348-2868

Sandra M. Kelly  
Ryan Kelly  
8884 Morning Mist Dr.  
Clarkston, MI 48348-2868

Shanna M. Kaminski  
P.O. Box 247  
Grass Lake, MI 49240-0247

Shannon Barnhardt  
49739 Chaucher Court  
Macomb, MI 48044-3899

Mark H. Shapiro  
25925 Telegraph Rd.  
Suite 203  
Southfield, MI 48033-2527

Sheffiled  
PO Box 25127  
Winston Salem, NC 27114-5127

Simna Kumar  
4424 Barchester Dr.  
Bloomfield Hills, MI 48302-2115

Site One Landscape Supply  
24110 Network Place  
Chicago, IL 60673-1241

Stafford Landscaping LLC  
PO Box 736  
Memphis, MI 48041-0736

State of Michigan  
Department of Attorney General  
Cadillac Place  
3030 West Grand Boulevard  
Detroit, MI 48202-6030

State of Michigan  
Department of Treasury  
Collections Division  
Treasury Building  
Lansing, MI 48922-0001

State of Michigan  
Department of Treasury  
P.O. Box 77437  
Detroit, MI 48277-0437

Stephanie Wells  
19489 Waltham Rd.  
Beverly Hills, MI 48025-5124

Stephanie Wells  
19489 Waltham Road  
Franklin, MI 48025-5124

Terry Riddle  
7605 17 Mile Road  
Sterling Heights, MI 48313-4533

The Hills of Lone Pine Association  
c/o Norman Orr  
201 West Big Beaver  
Suite 600  
Troy, MI 48064-4162

Tommisns Tounsel  
13221 Maple Lawn Drive  
Utica, MI 48315-2305

(p)US BANK  
PO BOX 5229  
CINCINNATI OH 45201-5229

U.S. Small Business Administration  
2 North Street, Suite 320  
Birmingham, AL 35203

U.S. Small Bussiness Administration  
2 North street, Suite 320  
Birmingham, AL 35203

Unique Funding Solution  
71 S Central Ave  
Suite 200  
Valley Stream, NY 11580-5403

United States of America (IRS)  
United States Attorney  
211 W. Fort Street  
Suite 2001  
Detroit, MI 48226-3220

Upstart Loan Operations  
PO Box 1503  
San Carlos, CA 94070-7503

V Cap  
333 Parsall Ave.  
Cedarhurst, NY 11516-1842

Valley Transport  
c/o Roberto Gonzalez  
2001 Waterman  
Detroit, MI 48209-1558

Changhua Wang  
c/o Doron Yitzchaki, Esq.  
Dickinson Wright PLLC  
350 South Main Street  
Suite 300  
Ann Arbor, MI 48104-2131

Western Equipment Finance, Inc.  
503 Highway 2 West  
Devils Lake, ND 58301-2938

Western Equipment Finance, Inc.  
P.O. Box 640  
Devils Lake, ND 58301-0640

Wiegands Farm  
32800 31 Mile Rd  
Lenox, MI 48050-1302

Wright Engineering  
1645 Village Center Circle  
Ste 10  
Las Vegas, NV 89134-6371

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Dickinson Wright PLLC  
350 S. Main Street  
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Ann Arbor, MI 48104-2131

Michael I. Zousmer  
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4190 Telegraph Road  
Ste. 3000  
Bloomfield Hills, MI 48302-2082

ally  
PO Box 380902  
Minneapolis, MN 55438-0902

c/o CRF Solutions  
PO Box 1389  
Simi Valley, CA 93062-1389

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

AmeriCredit Financial Services, Inc.  
P.O. Box 183853  
Arlington, TX 76096

(d)AmeriCredit Financial Services, Inc.  
dba GM Financial  
P O Box 183853  
Arlington, TX 76096

Bill  
6220 America Center Dr. Suite 100  
San Jose, CA 95002

Citizens Bank, N.A.  
One Citizens Plaza  
Providence, RI 02903

Interal Revenue Service  
Centralized Insolvency Operations  
PO Box 21126  
Philadelphia, PA 19114

Kabbage  
730 Peachtree St NE, Suite 1100  
Atlanta, GA 30308

U.S. Bank  
800 Nicollet Mall  
Minneapolis, MN 55402

(d)U.S. Bank National Association  
Bankruptcy Department  
PO Box 108  
Saint Louis MO 63166-0108

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)23 Mile Storage, LLC

(u)24 Capital  
1545 Route 202  
Suite 101  
NY 10907

(u)Ally Bank

(u)Ayham Ashkar 47681 Manorwood Drive Northvi

(u)EBF Holdings LLC

(u)Ernest M. Hassan III

(u)Amanda Pisarski

(u)SCP Distributors, LLC

(u)Mohamed Saad

(u)Angela Serrano

(d)Mark H. Shapiro  
25925 Telegraph Rd.  
Suite 203  
Southfield, MI 48033-2527

(u)Andrew R. Vara

End of Label Matrix

Mailable recipients 165

Bypassed recipients 12

Total 177

**EXHIBIT "2"**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

Exigent Landscaping, LLC  
*dba* Exigent Design and Build,  
  
Debtor.

Case No. 23-46912-tjt  
Judge Thomas J. Tucker  
Chapter 11

**ORDER AUTHORIZING DEBTOR TO EMPLOY COUNSEL**

This case is before the Court on the Debtor's Application for Authority to Employ Counsel (Docket # 29, the "Application"), and the concurrence in the Application filed by the United States Trustee (Docket # 40). The Court finds good cause to enter this Order.

IT IS ORDERED the Application is granted.

IT IS FURTHER ORDERED that Ernest M. Hassan, III and any member of Stevenson & Bullock, P.L.C., is authorized and empowered to act as attorney for the Debtor, consistent with the terms of employment set forth in the Application.

IT IS FURTHER ORDERED that all post-petition retainer funds must be deposited into a separate professional fee DIP account. Stevenson & Bullock, P.L.C.'s fees are subject to court approval under 11 U.S.C. §§ 330 and 331 and such retainer funds remain property of the estate. No professional is granted a security interest in such funds and use of those funds is subject to the provisions of the Bankruptcy Code, including the priorities under 11 U.S.C. § 507.

IT IS FURTHER ORDERED that all fees and expenses must be approved by the Court by separate Order.

IT IS FURTHER ORDERED that the entry of this Order does not, in itself, authorize the Debtor to use cash collateral.

**Signed on August 29, 2023**



**/s/ Thomas J. Tucker**

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**Thomas J. Tucker  
United States Bankruptcy Judge**

## EXHIBIT “3”

### SUMMARY OF NUMBER OF HOURS OF SERVICE

**Hours**                      **Attorney/Paralegal/Legal Assistant**                      **Hourly Rate**

0.40	Michael A. Stevenson, Attorney	\$550.00
0.30	Charles D. Bullock, Attorney	\$525.00
250.30	Ernest M. Hassan, III, Attorney	\$425.00
1.30	Elliot C. Crowder, Attorney	\$425.00
1.00	Leslie D. Haas, Paralegal	\$195.00
6.90	Maya Yazbek, Legal Assistant	\$135.00

**EXHIBIT “4”****PROJECT CATAGORIES**

<b><u>Hours</u></b>	<b><u>Description</u></b>	<b><u>Amount</u></b>
9.50	341 Meeting/2004 Examinations/Deposition	\$3,478.50
5.60	Adversary Proceeding	\$2,380.00
66.50	Case Administration	\$28,088.50
8.40	Case Collateral	\$3,454.00
59.10	Chapter 11 Plan/Disclosure Statement	\$24,051.50
.20	Claims Administration	\$85.00
3.00	Employment and Fee Application For Other Professionals	\$1,305.00
1.70	Employment and Fee Application For Stevenson & Bullock	\$630.50
24.10	Monthly Operating Reports/US Trustee Requirements	\$10,184.50
50.60	Motions	\$21,389.00
11.20	Sale, Realization, and Liquidation of Estate Property	\$4,760.00
20.30	Schedules/SOFA/Mean Test	\$8,627.50
260.20	Total	\$108,434.00



# STEVENSON & BULLOCK, P.L.C.

26100 American Drive, Suite 500

Southfield, MI 48034

Phone: (248)354-7906

Fax: (248)354-7907

Of Counsel, Michael J. Devine (1941-2013)

Michael A. Stevenson  
Charles D. Bullock\*  
Kimberly Bedigian  
Ernest M. Hassan, III  
Sonya N. Goll  
Elliot Crowder\*\*

\*Also licensed in Tennessee  
\*\*Also Licensed in New York

Exigent Landscaping, LLC  
Attn: Brandon Heitmann  
51517 Vn Dyke Rd.  
Shelby Township, MI 48316

February 22, 2024

In Reference To: **Debtor/Creditor Issues**

Invoice # 23959

## Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
<u>341 Meeting/2004 Examinations/Depositions</u>		
8/31/2023 EMH	0.30	127.50
Receipt and review of correspondence regarding 341	425.00/hr	
9/6/2023 EMH	0.60	255.00
Preparation for 341 regarding criminal issue associates with Exigent	425.00/hr	
EMH	3.10	1,317.50
Attendance at meeting with client	425.00/hr	
MAS	0.40	220.00
Conference with Hassan; formulate strategy for debtor's principal's testimony at 341 meeting, the overall scope of the meeting, the relevance of certain questions, whether such questions called for a legal conclusion, whether refusing to answer is necessary or advisable, and the consequences of doing the same	550.00/hr	
9/7/2023 MY	2.10	283.50
Prepare for 341 meeting of creditors; preparation of binder	135.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
9/8/2023	EMH Prepare for 341 meeting of creditors	0.50 425.00/hr	212.50
9/11/2023	EMH Meeting with client prior to 341 Meeting of creditors regarding status of case	0.40 425.00/hr	170.00
	EMH Attendance at 341 meeting of creditors	2.10 425.00/hr	892.50
	SUBTOTAL:	[ 9.50	3,478.50]
	<u>Adversary Proceedings</u>		
10/30/2023	EMH Preparation regarding motion to dismiss adversary	0.60 425.00/hr	255.00
11/14/2023	EMH Review of Adversary Proceeding regarding objection to discharge and formulate strategy	0.50 425.00/hr	212.50
11/17/2023	EMH Preparation of Response regarding Adversary Proceeding	0.90 425.00/hr	382.50
12/18/2023	EMH Preparation of motion for summary judgment regarding Adversary Proceeding	1.10 425.00/hr	467.50
12/27/2023	EMH Preparation regarding Motion for Summary Judgment for adversary.	0.80 425.00/hr	340.00
12/29/2023	EMH Telephone call with client regarding facts associates with Adversary Proceeding	0.30 425.00/hr	127.50
	EMH Receipt and review of correspondence from counsel for Askar regarding adjournment and deadline	0.20 425.00/hr	85.00
	EMH Prepare stipulation and order adjourning deadline to respond	0.30 425.00/hr	127.50

		<u>Hrs/Rate</u>	<u>Amount</u>
1/5/2024	EMH Receipt and review of correspondence from counsel for Askar regarding consent to adjournment	0.20 425.00/hr	85.00
1/9/2024	EMH Preparation of correspondence to counsel for Askar regarding Motion for Summary	0.20 425.00/hr	85.00
1/30/2024	EMH Telephone call with client regarding response to Adversary Proceeding	0.20 425.00/hr	85.00
	EMH Review and revise regarding motion to dismiss Adversary Proceeding	0.30 425.00/hr	127.50
SUBTOTAL:		[ 5.60	2,380.00]
<u>Case Administration</u>			
8/7/2023	EMH Telephone call with client regarding creditor issues; meeting with clients regarding finalize emergency petition and first day motions	3.10 425.00/hr	1,317.50
	EMH Receipt and review of correspondence regarding insurance	0.20 425.00/hr	85.00
8/8/2023	EMH Telephone call with client regarding creditor issues	0.20 425.00/hr	85.00
	EMH Telephone call with client regarding status of operations and bankruptcy issues	0.40 425.00/hr	170.00
8/9/2023	EMH Telephone call with Subchapter V Trustee and Office of the United States Trustee regarding bankruptcy issues	0.60 425.00/hr	255.00
8/10/2023	EMH Telephone call with agent from Macomb Daily regarding article	0.30 425.00/hr	127.50

		<u>Hrs/Rate</u>	<u>Amount</u>
8/14/2023	EMH Telephone call with client and Glen Franklin regarding status of case	0.60 425.00/hr	255.00
	EMH Telephone call with client regarding status of case	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from creditor regarding position moving forward	0.20 425.00/hr	85.00
8/15/2023	EMH Telephone call with counsel for customer regarding status of current retainer	0.40 425.00/hr	170.00
	MY Attention to compliance with order for status conference	0.40 135.00/hr	54.00
8/17/2023	EMH Telephone call with client regarding account receivable issues	0.30 425.00/hr	127.50
8/18/2023	EMH Prepare correspondence to counsel for Huntington regarding payroll issue	0.40 425.00/hr	170.00
8/22/2023	EMH Telephone call with Sub V Trustee regarding financial of Debtor	0.30 425.00/hr	127.50
	EMH Telephone call with client regarding engineer issues	0.30 425.00/hr	127.50
	EMH Telephone call with client regarding debtor in possession issues	0.30 425.00/hr	127.50
	EMH Conference call with Mr. Franklin, Mr. Phillips and Brandon regarding status of issues	1.10 425.00/hr	467.50
8/23/2023	EMH Telephone call with Mr. Heitmann regarding status of case	0.20 425.00/hr	85.00
	EMH Telephone call with Mr. Phillips regarding status of case	0.20 425.00/hr	85.00

		<u>Hrs/Rate</u>	<u>Amount</u>
8/23/2023	EMH Preparation of correspondence to counsel for Huntington regarding DIP Account	0.30 425.00/hr	127.50
8/24/2023	EMH Receipt and review of correspondence from counsel for customer regarding completion of job	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from client regarding First Foundation Bank	0.20 425.00/hr	85.00
	EMH Telephone call with Mr. Eisenberg regarding creditor issues and possible completion of pool	0.30 425.00/hr	127.50
	EMH Conference call with client regarding outstanding issues in the case	0.70 425.00/hr	297.50
8/25/2023	EMH Telephone call with client regarding creditor issues	0.50 425.00/hr	212.50
8/28/2023	EMH Telephone call with client regarding engineering issues	0.30 425.00/hr	127.50
	EMH Telephone call with Glen regarding status of customer concerns	0.30 425.00/hr	127.50
	EMH Prepare for Initial Status Conference	0.70 425.00/hr	297.50
	EMH Meeting with client regarding status of case	1.10 425.00/hr	467.50
8/29/2023	EMH Telephone call with Huntington regarding bank account issues	0.30 425.00/hr	127.50
	EMH Review and research regarding lien issue	0.60 425.00/hr	255.00
	EMH Formulate strategy regarding lien issue of Everest Funding	1.70 425.00/hr	722.50

		<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2023	EMH	0.20	85.00
	Receipt and review of correspondence from client regarding engineer issues	425.00/hr	
8/30/2023	EMH	0.30	127.50
	Attendance at initial scheduling conference	425.00/hr	
	EMH	0.40	170.00
	Conference call with client and bookkeeper regarding bi-weekly reporting	425.00/hr	
	EMH	0.50	212.50
	Preparation for initial scheduling conference	425.00/hr	
	EMH	0.20	85.00
	Telephone call with Subchapter V Trustee regarding bi-weekly reporting	425.00/hr	
	EMH	0.20	85.00
	Telephone call with Office of the United States Trustee regarding bi-weekly reporting	425.00/hr	
	EMH	0.20	85.00
	Telephone call with client regarding status of case	425.00/hr	
	EMH	0.40	170.00
	Telephone call with client regarding lien issues on non-estate property	425.00/hr	
	EMH	0.90	382.50
	Meeting with client regarding bi-weekly reporting and creditor issues	425.00/hr	
	EMH	0.40	170.00
	Telephone call with client regarding bi-weekly reporting issues	425.00/hr	
8/31/2023	EMH	0.30	127.50
	Telephone call with Mr. Kahn regarding claims and defenses of Mrs. Powers	425.00/hr	
	EMH	0.30	127.50
	Another call with Mr. Kahn regarding claims, defenses and settlement of Mrs. Powers	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2023	EMH Telephone call with counsel for landlord regarding stipulation and order	0.30 425.00/hr	127.50
	EMH Prepare correspondence to client regarding IDI issues, landlord issues, Western issues, Caterpillar issues; power issues and employment of accountant	0.40 425.00/hr	170.00
	EMH Revise Order regarding landlord	0.50 425.00/hr	212.50
9/5/2023	EMH Receipt and review of correspondence from Mr. Harrington regarding creditor issues	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from Pool Corp regarding creditor issues	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence to client and forwarded to Trustee and Subchapter V Trustee regarding same	0.30 425.00/hr	127.50
	EMH Attendance at meeting with client	3.50 425.00/hr	1,487.50
9/6/2023	EMH Receipt and review of correspondence from client regarding unemployment issues	0.20 425.00/hr	85.00
	EMH Preparation of correspondence to Mr. Kahn regarding settlement	0.20 425.00/hr	85.00
9/7/2023	EMH Preparation of coversheet, Order for Administrative Closing for State court regarding administrative stay	0.60 425.00/hr	255.00
	EMH Telephone call with 41A District court regarding stay of proceedings	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from Office of the United States Trustee regarding information from Schedule D	0.20 425.00/hr	85.00

		<u>Hrs/Rate</u>	<u>Amount</u>
9/7/2023	EMH	0.30	127.50
	Addressed issue incident to Office of the United States Trustee's request regarding Schedule D and preparation correspondence regarding same	425.00/hr	
	EMH	0.60	255.00
	Preparation regarding letter for violation of stay	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence from client regarding Huntington account	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence form client regarding First Foundation Bank	425.00/hr	
	EMH	0.30	127.50
	Telephone call with agent of first Foundation Bank regarding construction equipment	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from client regarding sale of compact tract loader	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of follow up correspondence from client regarding sale of compact tract loader	425.00/hr	
9/8/2023	EMH	0.30	127.50
	Receipt and review of correspondence from landlord regarding stipulation and order	425.00/hr	
	EMH	0.20	85.00
	Telephone call with Mr. Phillips regarding creditor issues	425.00/hr	
	EMH	0.30	127.50
	Preparation of correspondence to potential account regarding retention	425.00/hr	
	EMH	0.20	85.00
	Preparation of correspondence to agents of Western Equipment Financial	425.00/hr	



		<u>Hrs/Rate</u>	<u>Amount</u>
9/10/2023	EMH Receipt and review of correspondence from Mr. Kahn regarding executory contracts; evaluate same	0.30 425.00/hr	127.50
9/12/2023	EMH Telephone call with client regarding bi weekly reporting	0.30 425.00/hr	127.50
	EMH Telephone call with Subchapter V trustee regarding bi-weekly reporting and transparency issues	0.40 425.00/hr	170.00
	EMH Another call with client regarding the bi-weekly reporting	0.20 425.00/hr	85.00
	EMH Preparation and finalize bi weekly report	0.40 425.00/hr	170.00
	EMH Telephone call with bookkeeper regarding accounting issue	0.30 425.00/hr	127.50
	EMH Receipt, review and prepare draft of bi-weekly reporting	0.40 425.00/hr	170.00
9/13/2023	EMH Telephone call with bookkeeper regarding bi-weekly financials	0.30 425.00/hr	127.50
	EMH Preparation of correspondence to client regarding authority to file bi-weekly reporting and Debtor's Updated Plan Progress Report	0.30 425.00/hr	127.50
9/14/2023	EMH Receipt and review of correspondence from client regarding issues with Western	0.20 425.00/hr	85.00
	EMH Telephone call with client regarding status of case	0.30 425.00/hr	127.50
9/15/2023	EMH Telephone call with Pawnee Leasing regarding retention of van	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from agent of Pawnee Leasing regarding 2018 Van	0.20 425.00/hr	85.00

		<u>Hrs/Rate</u>	<u>Amount</u>
9/15/2023	EMH	0.20	85.00
	Preparation of supplemental 2016b regarding payments	425.00/hr	
	EMH	0.20	85.00
	Prepare correspondence to client regarding Supplemental 2016b	425.00/hr	
	EMH	0.30	127.50
	Telephone call with client regarding classic pool issue	425.00/hr	
	EMH	0.30	127.50
	Preparation of correspondence to 41A District Court regarding stay of proceedings	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from client regarding bank account issues	425.00/hr	
	EMH	0.30	127.50
	Prepare correspondence to client regarding issues with Pawnee Leasing	425.00/hr	
	EMH	0.40	170.00
	Preparation of correspondence to client regarding issues with Pawnee Leasing	425.00/hr	
	EMH	0.40	170.00
	Preparation of correspondence regarding violation of automatic stay of classic pools	425.00/hr	
	EMH	0.40	170.00
	Preparation of correspondence to client regarding issues with Pawnee Leasing	425.00/hr	
	EMH	0.60	255.00
	Telephone call with client regarding outstanding clients and profitability	425.00/hr	
	EMH	0.20	85.00
	Another telephone call with client regarding fuel vendor issues	425.00/hr	
9/18/2023	EMH	0.30	127.50
	Telephone call with client regarding status of case	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
9/18/2023	EMH Telephone call with Subchapter V Trustee regarding account issue	0.30 425.00/hr	127.50
	EMH Receipt and review of correspondence from client small claims hearing with Arlington	0.30 425.00/hr	127.50
	EMH Telephone call with Office of the United States Trustee regarding outstanding issues of case	0.40 425.00/hr	170.00
	EMH Telephone call with 41-A District Court regarding hearing on Friday with Arlington	0.20 425.00/hr	85.00
	EMH Research and review issues regarding "gross mismanagement"	0.80 425.00/hr	340.00
9/19/2023	EMH Receipt and review of correspondence from Shara regarding financials	0.20 425.00/hr	85.00
	EMH Receipt and review of engagement letter	0.20 425.00/hr	85.00
9/20/2023	EMH Telephone call with client regarding Debtor financials	0.30 425.00/hr	127.50
	EMH Preparation for Pre-Confirmation status conference	0.60 425.00/hr	255.00
9/21/2023	EMH Telephone call with client regarding status of case	0.30 425.00/hr	127.50
	EMH Preparation for call with Mr. Kahan regarding settlement of claims	0.50 425.00/hr	212.50
	EMH Telephone call with Mr. Kahn regarding creditor issue	0.60 425.00/hr	255.00
	EMH Telephone call with client regarding status	0.60 425.00/hr	255.00

		<u>Hrs/Rate</u>	<u>Amount</u>
9/26/2023	EMH	0.60	255.00
	Preparation for pre-confirmation status conference	425.00/hr	
	EMH	0.30	127.50
	Telephone call with Glen regarding status of case	425.00/hr	
9/28/2023	EMH	0.30	127.50
	Telephone call with client regarding account receivable	425.00/hr	
	EMH	0.30	127.50
	Discussion with Mr. Franklin regarding outstanding account receivables	425.00/hr	
9/29/2023	EMH	0.20	85.00
	Prepare correspondence to accountant regarding 2022 tax returns	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from Western regarding surrender of equipment	425.00/hr	
10/9/2023	EMH	0.30	127.50
	Preparation of correspondence to client regarding status of case	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence from book keeper regarding bi weekly report	425.00/hr	
	EMH	0.20	85.00
	Preparation of correspondence to Mr. Kahn regarding creditor issues	425.00/hr	
	EMH	0.20	85.00
	Preparation of correspondence to bookkeeper regarding Bi-Weekly reporting	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from accountant regarding 2022 tax returns	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence from First Foundation regarding reaffirmation and surrender	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
10/9/2023	EMH Prepare correspondence to client regarding bi weekly report	0.20 425.00/hr	85.00
10/10/2023	EMH Telephone call with client regarding status of bankruptcy	0.20 425.00/hr	85.00
10/11/2023	EMH Receipt and review of correspondence from client regarding sale of equipment	0.20 425.00/hr	85.00
10/12/2023	EMH Telephone call with Mr. Kahn regarding Powers settlement of claims	0.40 425.00/hr	170.00
	EMH Receipt and review of correspondence from client regarding sale issues	0.20 425.00/hr	85.00
10/13/2023	EMH Telephone call with client regarding status of case	0.20 425.00/hr	85.00
10/16/2023	EMH Receipt and review of correspondence from Western regarding surrender	0.20 425.00/hr	85.00
	EMH Preparation of correspondence to accountant regarding 2022 tax returns	0.30 425.00/hr	127.50
	EMH Telephone call with Brandon regarding Office of the United States Trustee issues and Caterpillar issues	0.80 425.00/hr	340.00
10/17/2023	EMH Receipt and review of correspondence regarding rejection of contract for Lone Pine	0.30 425.00/hr	127.50
10/19/2023	EMH Telephone call with Mr. Phillips regarding claims against Powers	0.20 425.00/hr	85.00
10/20/2023	EMH Telephone call with client regarding insurance issue	0.20 425.00/hr	85.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/20/2023	EMH Telephone call with insurance company regarding insurance issue	0.20 425.00/hr	85.00
	EMH Prepare correspondence regarding insurance	0.20 425.00/hr	85.00
10/25/2023	EMH Telephone call with counsel for Everest Business Funding	0.20 425.00/hr	85.00
11/1/2023	EMH Receipt and review of correspondence from client regarding issues with 2022 tax return	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from Office of the United States Trustee regarding information request including tax returns	0.30 425.00/hr	127.50
	EMH Telephone call with Subchapter V Trustee regarding status of case	0.30 425.00/hr	127.50
	EMH Telephone call with Office of the United States Trustee regarding status of case	0.40 425.00/hr	170.00
	EMH Preparation of correspondence regarding issues with 2022 tax returns	0.50 425.00/hr	212.50
11/3/2023	EMH Receipt and review of correspondence from bookkeeper regarding 2022 transfers	0.30 425.00/hr	127.50
	EMH Preparation of correspondence to Trustee regarding 2022 tax return	0.40 425.00/hr	170.00
11/6/2023	EMH Receipt and review of correspondence regarding rejection of contract	0.20 425.00/hr	85.00

		<u>Hrs/Rate</u>	<u>Amount</u>
11/8/2023	EMH	0.20	85.00
	Telephone call with counsel for landlord regarding lease	425.00/hr	
	EMH	0.20	85.00
	Preparation of correspondence to counsel for landlord regarding lease	425.00/hr	
	EMH	0.30	127.50
	Finalize bi-weekly report	425.00/hr	
	EMH	0.40	170.00
	Telephone call with client regarding amendments	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence from bookkeeper regarding bi-weekly report	425.00/hr	
11/13/2023	EMH	0.30	127.50
	Receipt and review of correspondence from bookkeeper regarding bi weekly report	425.00/hr	
11/14/2023	EMH	0.30	127.50
	Preparation and receipt and review of correspondence from Mr. Babi regarding landlord issues	425.00/hr	
11/16/2023	EMH	0.20	85.00
	Receipt and review of correspondence to client regarding sale of vehicle	425.00/hr	
11/17/2023	EMH	0.30	127.50
	Telephone call from client regarding status of case	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from client regarding SCP pools	425.00/hr	
11/28/2023	EMH	0.40	170.00
	Telephone call with client regarding payroll issues associates with the statement of financial affairs	425.00/hr	
11/29/2023	EMH	0.30	127.50
	Preparation of correspondence regarding client regarding amended Statement of Financial Affairs	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2023	EMH Preparation of correspondence to client regarding Hills of Lone Pine	0.20 425.00/hr	85.00
11/30/2023	EMH Preparation of supplementnal 2016(b)	0.20 425.00/hr	85.00
	EMH Another telephone call with client regarding account receivable issues	0.40 425.00/hr	170.00
12/13/2023	EMH Preparation of correspondence to client regarding Caterpillar	0.20 425.00/hr	85.00
	EMH Telephone call with client regarding status of case	0.30 425.00/hr	127.50
	EMH Receipt and review of correspondence from counsel for landlord regarding payment	0.30 425.00/hr	127.50
12/14/2023	EMH Receipt and review of correspondence from client regarding First Foundation issues	0.20 425.00/hr	85.00
12/15/2023	EMH Preparation for and attendance on call with the Subchapter V Trustee regarding status of the case	0.30 425.00/hr	127.50
12/19/2023	EMH Receipt and review of correspondence from Mr. Heitmann personal counsel regarding stay issues associate with lawsuit filed by Citizens Bank	0.30 425.00/hr	127.50
	EMH Preparation of correspondence to client regarding amended statement of financial affairs	0.30 425.00/hr	127.50
	EMH Preparation of correspondence to client regarding amended Statement of Financial Affairs	0.30 425.00/hr	127.50
12/20/2023	EMH Receipt and review of correspondence from Mr. Miller regarding accounting for contractor payments	0.30 425.00/hr	127.50



		<u>Hrs/Rate</u>	<u>Amount</u>
12/28/2023	EMH	0.20	85.00
	Telephone call with bookkeeper regarding financial of debtor.	425.00/hr	
1/2/2024	EMH	0.20	85.00
	Telephone call with client regarding status of case	425.00/hr	
1/15/2024	EMH	0.30	127.50
	Receipt and review of correspondence from Shara regarding yearly financial of the business	425.00/hr	
	EMH	0.40	170.00
	Receipt and review of correspondence from Shara regarding August profit and loss	425.00/hr	
1/17/2024	EMH	0.30	127.50
	Preparation of bi-weekly reporting and preparation of correspondence regarding same	425.00/hr	
	EMH	0.30	127.50
	Preparation of supplemental 2016(b) and preparation of correspondence regarding same	425.00/hr	
1/19/2024	EMH	0.10	42.50
	Telephone call with client regarding status of case	425.00/hr	
1/22/2024	EMH	0.20	85.00
	Receipt and review of correspondence from client regarding strategy moving forward	425.00/hr	
	EMH	0.30	127.50
	Prepare correspondence to client regarding strategy moving forward	425.00/hr	
1/24/2024	MY	0.20	27.00
	Preparation of correspondence to Robert Bassel regarding payment	135.00/hr	
1/26/2024	EMH	0.40	170.00
	Telephone call with client regarding status of litigation	425.00/hr	
1/31/2024	EMH	0.20	85.00
	Telephone call with court regarding motion to dismiss	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
1/31/2024	EMH Telephone call with Mr. Plemmons regarding surrender of CAT equipment	0.30 425.00/hr	127.50
	EMH Receipt and review of correspondence from Mr. Plemmons regarding surrender of CAT equipment	0.40 425.00/hr	170.00
2/5/2024	EMH Receipt and review of correspondence from accountant regarding 2023 tax returns	0.20 425.00/hr	85.00
	EMH Telephone call with client regarding status of case	0.30 425.00/hr	127.50
2/6/2024	EMH Prepare correspondence to client regarding status of case	0.20 425.00/hr	85.00
2/7/2024	EMH Telephone call with Mr. Phillips regarding status of bankruptcy	0.20 425.00/hr	85.00
	EMH Prepare correspondence to Mr. Plemmons regarding surrender of CAT equipment	0.30 425.00/hr	127.50
2/8/2024	EMH Telephone call with Mr. Phillips regarding status of bankruptcy	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from counsel for landlord regarding payment	0.30 425.00/hr	127.50
2/9/2024	EMH Receipt and review of correspondence from client regarding status of case	0.20 425.00/hr	85.00
SUBTOTAL:		[ 66.50	28,088.50]
<u>Cash Collateral</u>			
8/11/2023	MY Compliance with order for cash collateral	0.40 135.00/hr	54.00

		<u>Hrs/Rate</u>	<u>Amount</u>
8/22/2023	EMH Receipt, review and evaluate of correspondence from Kelley Callard regarding cash collateral issues	0.30 425.00/hr	127.50
8/23/2023	EMH Preparation of correspondence to Subchapter V Trustee and Office of the United States Trustee regarding cash collateral	0.20 425.00/hr	85.00
	EMH Telephone call with counsel for landlord regarding rent issue	0.30 425.00/hr	127.50
8/24/2023	EMH Receipt and review of correspondence from Mr. Plemmens from Caterpillar; formulate strategy regarding adequate protection payments	0.50 425.00/hr	212.50
8/29/2023	EMH Telephone call with Subchapter V Trustee regarding cash collateral issues	0.20 425.00/hr	85.00
	EMH Receipt and review of correspondence from counsel for Everest Funding regarding cash collateral	0.20 425.00/hr	85.00
	EMH Telephone call with counsel for engineer regarding continuing services	0.30 425.00/hr	127.50
	EMH Telephone conference with Office of the United States Trustee regarding cash collateral issues	0.30 425.00/hr	127.50
	EMH Preparation of response to counsel for Everest funding regarding cash collateral	0.30 425.00/hr	127.50
	EMH Prepare correspondence to counsel for Everest regarding cash collateral issue	0.30 425.00/hr	127.50
	EMH Finalize Stipulation and Order for Adequate Protection regarding landlord; preparation of correspondence to counsel for landlord regarding same	0.50 425.00/hr	212.50

		<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2023	EMH	0.50	212.50
	Preparation of correspondence to counsel for Catepillar regarding automatic stay and adequate protection	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of order for cash collateral; instructions regarding same	425.00/hr	
	EMH	0.40	170.00
	Modify stipulation and order for cash collateral	425.00/hr	
8/30/2023	EMH	0.20	85.00
	Receipt and review of correspondence from Subchapter V Trustee regarding cash collateral	425.00/hr	
	EMH	0.30	127.50
	Prepare correspondence to creditor, Subchapter V Trustee and Office of the United States Trustee regarding amended cash collateral order	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence from Office of the United States Trustee regarding cash collateral	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence from creditor regarding amended cash collateral	425.00/hr	
	EMH	0.30	127.50
	Preparation of amended Stipulation and Order regarding cash collateral pursuant to Judge's comments	425.00/hr	
	EMH	0.40	170.00
	Finalized stipulation and order regarding amended cash collateral	425.00/hr	
8/31/2023	EMH	0.20	85.00
	Telephone call with client regarding landlord issues	425.00/hr	
	EMH	1.10	467.50
	Receipt and review of correspondence regarding landlord issues and revise stipulation and order regarding adequate protection and lift of stay	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
10/9/2023	EMH Receipt and review of correspondence from client regarding Caterpillar equipment adequate protection	0.20 425.00/hr	85.00
	EMH Review of and strategize regarding Caterpillar equipment adequate protection	0.20 425.00/hr	85.00
10/11/2023	EMH Receipt and review of correspondence from Western regarding return of collateral	0.20 425.00/hr	85.00
	SUBTOTAL:	[ 8.40	3,454.00]
<u>Chapter 11 Plan/Disclosure Statement</u>			
8/17/2023	EMH Preparation of business plan	0.60 425.00/hr	255.00
8/31/2023	EMH Receipt and review of Order Establishing Deadlines and Procedures	0.20 425.00/hr	85.00
9/13/2023	EMH Preparation regarding Debtor's updated plan progress report	0.70 425.00/hr	297.50
10/3/2023	EMH Revise plan accordingly	0.40 425.00/hr	170.00
10/4/2023	EMH Preparation of plan and related documents	1.30 425.00/hr	552.50
10/16/2023	EMH Preparation of plan	0.60 425.00/hr	255.00
10/18/2023	EMH Prepare correspondence to Corporate service regarding UCC issues	0.30 425.00/hr	127.50
	EMH Preparation of Chapter 11 Plan	1.50 425.00/hr	637.50

		<u>Hrs/Rate</u>	<u>Amount</u>
10/19/2023	EMH Receipt and review of correspondence from Landlord regarding plan treatment	0.20 425.00/hr	85.00
10/20/2023	LDH Preparation regarding Chapter 11 plan	0.60 195.00/hr	117.00
10/23/2023	EMH Preparation of plan and related documents	1.10 425.00/hr	467.50
10/24/2023	EMH Telephone call with client regarding Chapter 11 Plan	0.80 425.00/hr	340.00
	EMH Preparation of Plan	1.70 425.00/hr	722.50
10/25/2023	EMH Telephone call with accountant regarding plan issues	0.30 425.00/hr	127.50
	EMH Meeting with client	0.80 425.00/hr	340.00
	EMH Preparation of plan and liquidation analysis	0.50 425.00/hr	212.50
10/26/2023	EMH Preparation of Plan and related documents	4.70 425.00/hr	1,997.50
	EMH Telephone call with client regarding Chapter 11 Plan	0.60 425.00/hr	255.00
10/27/2023	EMH Preparation of plan and related documents	2.10 425.00/hr	892.50
10/30/2023	EMH Preparation of plan and related documents	2.10 425.00/hr	892.50
10/31/2023	EMH Telephone call with client regarding Plan issues	0.30 425.00/hr	127.50
	EMH Telephone call with client regarding Plan	0.40 425.00/hr	170.00

		<u>Hrs/Rate</u>	<u>Amount</u>
10/31/2023	EMH	0.70	297.50
	Formulate strategy and preparation of plan regarding creditor issues	425.00/hr	
	EMH	4.10	1,742.50
	Preparation of plan and related documents	425.00/hr	
11/1/2023	EMH	0.30	127.50
	Telephone call with bookkeeper regarding plan projections	425.00/hr	
	EMH	0.30	127.50
	Telephone call with client regarding plan issues	425.00/hr	
	EMH	0.60	255.00
	Preparation of plan and related documents	425.00/hr	
	EMH	0.30	127.50
	Telephone call with counsel for SBA regarding Proof of Claim issues and treatment in plan	425.00/hr	
11/2/2023	EMH	0.20	85.00
	Preparation of correspondence to client regarding plan	425.00/hr	
	EMH	0.40	170.00
	Telephone call with bookkeeper regarding outstanding action items including plan projections, assets of debtor and transfer of assets in 2022	425.00/hr	
	EMH	0.40	170.00
	Telephone call with client regarding projections	425.00/hr	
	EMH	0.60	255.00
	Revise plan accordingly	425.00/hr	
	EMH	1.30	552.50
	Telephone call with client and bookkeeper regarding plan projections	425.00/hr	
	EMH	1.70	722.50
	Review and revise Chapter 11 Plan	425.00/hr	
11/3/2023	EMH	0.40	170.00
	Telephone call with client regarding outstanding items	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
11/6/2023	EMH Meeting with client regarding Chapter 11 Plan	0.70 425.00/hr	297.50
11/9/2023	EMH Receipt and review of correspondence from Barajas Enterprise regarding plan issues	0.20 425.00/hr	85.00
11/13/2023	EMH Telephone call with counsel for Powers regarding settlement	0.30 425.00/hr	127.50
11/17/2023	EMH Receipt and review of correspondence from Mr. Orr regarding ballot and claim	0.30 425.00/hr	127.50
11/20/2023	EMH Receipt and review of correspondence from creditor regarding plan issues	0.20 425.00/hr	85.00
11/29/2023	EMH Telephone call with Ms. Callard regarding Office of the United States Trustee's Motion to Dismiss and Confirmation	0.30 425.00/hr	127.50
	MY Compliance with order to adjourn confirmation hearing	0.80 135.00/hr	108.00
	EMH Telephone call with court regarding adjournment and scheduling	0.20 425.00/hr	85.00
	EMH Preparation of correspondence to Mr. Sackllah regarding adjournment	0.30 425.00/hr	127.50
	EMH Preparation of ex parte motion to adjourn and extend	0.40 425.00/hr	170.00
11/30/2023	EMH Telephone call with client regarding status	0.20 425.00/hr	85.00
12/12/2023	EMH Receipt and review of correspondence from client regarding Ballot Summary	0.20 425.00/hr	85.00
	EMH Preparation of Ballot Summary	0.90 425.00/hr	382.50



		<u>Hrs/Rate</u>	<u>Amount</u>
12/13/2023	EMH Preparation of correspondence to client regarding plan feasibility	0.20 425.00/hr	85.00
12/15/2023	EMH Receipt and review of correspondence from client regarding Saad objection	0.20 425.00/hr	85.00
12/19/2023	EMH Receipt and review of correspondence from client regarding Mr. Saad creditor issues	0.20 425.00/hr	85.00
	EMH Preparation of correspondence to client regarding outstanding issues including bankruptcy court requirements regarding plan feasibility	0.30 425.00/hr	127.50
12/20/2023	EMH Receipt and review of United States Trustee objection to confirmation of Chapter 11 Plan	0.50 425.00/hr	212.50
12/21/2023	EMH Preparation of correspondence to client regarding objection to plan by Mr. Saad	0.20 425.00/hr	85.00
	EMH Preparation of correspondence to client regarding Office of the United States Trustee objection to plan	0.20 425.00/hr	85.00
	EMH Preparation of correspondence to client regarding Internal Revenue Service objection to plan	0.20 425.00/hr	85.00
12/27/2023	EMH Receipt and review of correspondence from counsel for Caterpillar regarding adequate protection.	0.20 425.00/hr	85.00
12/28/2023	EMH Preparation of correspondence to client regarding objection to plan filed by the United States Trustee.	0.30 425.00/hr	127.50
	EMH Preparation of correspondence to client regarding objection filed by Mr. Saad.	0.30 425.00/hr	127.50

		<u>Hrs/Rate</u>	<u>Amount</u>
12/28/2023	EMH	0.30	127.50
	Preparation of correspondence to client regarding Caterpillar issues.	425.00/hr	
12/29/2023	EMH	0.40	170.00
	Formulate strategy regarding Caterpillar issues	425.00/hr	
1/2/2024	EMH	0.50	212.50
	Receipt and review of Office of the United States Trustee objection to Debtor's Subchapter V Plan of Reorganization	425.00/hr	
	EMH	0.90	382.50
	Preparation regarding stipulation and order for Internal Revenue Service objections	425.00/hr	
1/3/2024	EMH	2.10	892.50
	Preparation for and meeting with client regarding status of case	425.00/hr	
1/9/2024	EMH	0.20	85.00
	Preparation of correspondence to Internal Revenue Service regarding confirmation	425.00/hr	
	EMH	0.40	170.00
	Receipt and review of late ballots and run amended ballot summary	425.00/hr	
	EMH	0.40	170.00
	Formulate strategy regarding position of case	425.00/hr	
	MY	0.50	67.50
	Preparation of Exigent Ballot Summary and detail	135.00/hr	
1/10/2024	EMH	0.50	212.50
	Zoom conference with Mr. Phillips and Mr. Leggeo regarding status of Chapter 11	425.00/hr	
	EMH	0.80	340.00
	Zoom with Mr. Phillip, Mr. Leegio, Mr. B. Heitmann and Mr. Brandon Hetimann	425.00/hr	
1/11/2024	MY	0.30	40.50
	Revise ballot summary and ballot summary detail	135.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
1/11/2024	EMH Telephone call with client regarding status of case	0.70 425.00/hr	297.50
1/12/2024	EMH Telephone call with counsel for Mr. Saad regarding settlement of claims	0.40 425.00/hr	170.00
	EMH Preparation of ballot summary and related documents	0.80 425.00/hr	340.00
	MY Revise ballot summary detail	1.60 135.00/hr	216.00
1/17/2024	EMH Preparation of Memorandum in support of confirmation	0.50 425.00/hr	212.50
	EMH Telephone with client regarding status of case. Motion to Convert and Confirmation of Plan	1.20 425.00/hr	510.00
1/19/2024	EMH Telephone call with counsel for creditor, Mr. Saad regarding status of case	0.30 425.00/hr	127.50
	EMH Preparation of amended ballot summary	0.40 425.00/hr	170.00
	EMH Preparation of memorandum regarding confirmation and related documents	0.90 425.00/hr	382.50
1/24/2024	EMH Telephone call with agent for Internal Revenue Service regarding plan	0.20 425.00/hr	85.00
	EMH Preparation of correspondence to counsel for Internal Revenue Service regarding issues with plan confirmation	0.20 425.00/hr	85.00
	EMH Meeting with client after hearing on conversion and plan objections	0.30 425.00/hr	127.50

		<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2024	EMH	0.40	170.00
	Meeting with client prior to hearing on conversion and plan confirmation	425.00/hr	
	EMH	1.20	510.00
	Prepare for hearing conversion and plan objection	425.00/hr	
	EMH	1.60	680.00
	Attendance at hearing on conversion and plan objections	425.00/hr	
2/5/2024	EMH	0.20	85.00
	Receipt and review of correspondence from client regarding status of case	425.00/hr	
	SUBTOTAL:	[ 59.10	24,051.50]
	<u>Claims Administration</u>		
2/7/2024	EMH	0.20	85.00
	Receipt and review of correspondence regarding claims issues	425.00/hr	
	SUBTOTAL:	[ 0.20	85.00]
	<u>Employment and Fee Application for Other Professionals</u>		
9/5/2023	EMH	0.20	85.00
	Preparation of correspondence regarding employment of accountant	425.00/hr	
9/11/2023	EMH	0.20	85.00
	Receipt and review of correspondence regarding employment of accountant from Mr. Hutchens	425.00/hr	
9/15/2023	EMH	0.30	127.50
	Receipt and review of correspondence regarding application to employ accountant	425.00/hr	
	EMH	0.30	127.50
	Prepare correspondence to bookkeeper regarding employment of accountant	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
9/19/2023	EMH	0.30	127.50
	Prepare correspondence to accountant regarding employment	425.00/hr	
	EMH	0.30	127.50
	Preparation of correspondence to account regarding revised application to employ	425.00/hr	
	CDB	0.30	157.50
	Preparation of correspondence to accountant regarding employment	525.00/hr	
	EMH	0.40	170.00
	Telephone calls with accounting regarding application to employ	425.00/hr	
	EMH	0.40	170.00
	Preparation regarding application to employ accountant	425.00/hr	
9/20/2023	EMH	0.30	127.50
	Finalize application to employ accountant	425.00/hr	
	SUBTOTAL:	[ 3.00	1,305.00]
<u>Employment and Fee Application for Stevenson &amp; Bullock</u>			
8/17/2023	EMH	0.40	170.00
	Preparation of application to employ	425.00/hr	
8/21/2023	EMH	0.40	170.00
	Preparation regarding application to employ	425.00/hr	
8/28/2023	EMH	0.20	85.00
	Preparation of correspondence to Office of the United States Trustee regarding application to employ	425.00/hr	
8/29/2023	EMH	0.10	42.50
	Finalized statement of consent for employing for employment of Stevenson & Bullock, P.L.C.	425.00/hr	
8/30/2023	EMH	0.20	85.00
	Preparation regarding application to employ	425.00/hr	
2/12/2024	LDH	0.40	78.00
	Further revisions to first and final fee application	195.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
	SUBTOTAL:	[ 1.70	630.50]
	<u>Monthly Operating Reports/US Trustee Requirements</u>		
8/15/2023	EMH	0.30	127.50
	Telephone call with Kelley Callard regarding reporting requirement	425.00/hr	
8/17/2023	EMH	0.30	127.50
	Telephone call with client regarding DIP account issues	425.00/hr	
8/21/2023	EMH	0.60	255.00
	Preparation regarding IDI documentation	425.00/hr	
8/23/2023	EMH	3.50	1,487.50
	Meeting with client regarding status of case; preparation of initial debtor interview and attendance regarding same	425.00/hr	
8/31/2023	EMH	0.30	127.50
	Receipt and review of correspondence from Office of the United States Trustee regarding IDI requests	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of correspondence from Office of the United States Trustee regarding tax return issues	425.00/hr	
9/7/2023	EMH	0.30	127.50
	Telephone call with client regarding outstanding Office of the United States Trustee request regarding Schedule D	425.00/hr	
9/13/2023	EMH	0.30	127.50
	Preparation regarding mothly operating report	425.00/hr	
9/14/2023	EMH	0.40	170.00
	Receipt and review of correspondence from United States Trustee regarding documentation and information request	425.00/hr	
9/15/2023	EMH	0.30	127.50
	Preparation of correspondence to client and bookkeeper regarding monthly operating report	425.00/hr	
9/18/2023	EMH	0.30	127.50
	Receipt and review of correspondence from client regarding monthly operating report issues	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
9/18/2023	EMH Conference call with client and bookkeeper regarding Monthly operating report for August	0.40 425.00/hr	170.00
9/21/2023	EMH Prepare correspondence to Mr. Carr regarding documentation and information request	0.20 425.00/hr	85.00
	EMH Preparation of document request regarding Office of the United States Trustee request	0.40 425.00/hr	170.00
	EMH Receipt and review of correspondence from Office of the United States Trustee regarding document request	0.20 425.00/hr	85.00
9/26/2023	EMH Telephone call with client regarding status of Office of the United States Trustee's request	0.30 425.00/hr	127.50
	EMH Prepare correspondence to bookkeeper regarding Office of the United States Trustee questions	0.30 425.00/hr	127.50
	EMH Preparation of correspondence to client regarding Office of the United States Trustee questions	0.30 425.00/hr	127.50
	EMH Telephone call with client regarding Office of the United States Trustee issues	0.40 425.00/hr	170.00
	EMH Receipt and review of correspondence from the Office of the United States Trustee regarding documentation and information request; formulate strategy regarding same	0.60 425.00/hr	255.00
9/28/2023	EMH Telephone call with client regarding Office of the United States Trustee request	0.20 425.00/hr	85.00
9/29/2023	EMH Meeting with client regarding Office of the United States Trustee request	2.90 425.00/hr	1,232.50

		<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2023	EMH	0.20	85.00
	Prepare correspondence to client regarding Office of the United States Trustee and Subchapter V Trustee's conversations regarding contracts	425.00/hr	
	EMH	0.30	127.50
	Telephone call with client regarding Office of the United States Trustee and Subchapter V Trustee regarding contracts	425.00/hr	
	EMH	0.40	170.00
	Finalize response to Office of the United States Trustee and Subchapter V Trustee regarding contracts	425.00/hr	
10/4/2023	EMH	0.30	127.50
	Receipt and review of correspondence regarding Office of the United States Trustee document request	425.00/hr	
10/10/2023	EMH	0.30	127.50
	Preparation of correspondence to bookkeeper regarding bi-weekly report and Office of the United States Trustee's request	425.00/hr	
	EMH	1.60	680.00
	Prepare for and conference call with client regarding Office of the United States Trustee's request, plan and bi-weekly reporting	425.00/hr	
	EMH	0.40	170.00
	Preparation of response to Office of the United States Trustee's request for documents and preparation of correspondence to client regarding same	425.00/hr	
10/11/2023	EMH	0.30	127.50
	Telephone call with bookkeeper regarding plan projections and bi-weekly reporting issues	425.00/hr	
	EMH	0.40	170.00
	Telephone call with client regarding bi-weekly reports	425.00/hr	
10/12/2023	EMH	0.90	382.50
	Zoom call with client and bookkeeper regarding bi-weekly reporting issues	425.00/hr	
	EMH	0.20	85.00
	Telephone call with bookkeeper and client regarding bi-weekly reporting issues	425.00/hr	



		<u>Hrs/Rate</u>	<u>Amount</u>
10/13/2023	EMH Zoom call with client regarding Office of the United States Trustee issues	0.90 425.00/hr	382.50
10/18/2023	EMH Zoom call with Brandon and Shara regarding monthly operating report and projections for plan	1.10 425.00/hr	467.50
10/20/2023	EMH Zoom call regarding projections and monthly operating report	0.50 425.00/hr	212.50
11/20/2023	EMH Preparation of correspondence regarding monthly operating report; Receipt and review of correspondence from client regarding same	0.30 425.00/hr	127.50
11/27/2023	EMH Telephone call with bookkeeper regarding issues with the August monthly operating report	0.30 425.00/hr	127.50
12/6/2023	MY Preparation of debtor bi-weekly report	0.20 135.00/hr	27.00
12/20/2023	EMH Receipt and review of version of November monthly operating report for filing	0.30 425.00/hr	127.50
	EMH Preparation of correspondence to client regarding November Monthly Operating Report and bi-weekly reporting	0.30 425.00/hr	127.50
1/16/2024	EMH Telephone call with bookkeeper regarding amended August monthly operating report	0.20 425.00/hr	85.00
	EMH Preparation of amended August monthly operating report	0.50 425.00/hr	212.50
1/17/2024	EMH Telephone call with bookkeeper regarding August monthly operating report	0.30 425.00/hr	127.50
1/18/2024	EMH Telephone call with Office of the United States Trustee regarding August monthly operating report	0.30 425.00/hr	127.50

		<u>Hrs/Rate</u>	<u>Amount</u>
1/19/2024	EMH	0.20	85.00
	Telephone call with bookkeeper regarding financial reporting	425.00/hr	
	EMH	0.40	170.00
	Prepare amended August monthly operating report	425.00/hr	
	SUBTOTAL:	[ 24.10	10,184.50]
	<u>Motions</u>		
8/8/2023	EMH	0.20	85.00
	Receipt and review of Order scheduling hearing on first day motions	425.00/hr	
	EMH	0.50	212.50
	Address issues regarding first day motions	425.00/hr	
	EMH	0.10	42.50
	Telephone call with court regarding scheduling of first day motions	425.00/hr	
8/9/2023	MY	0.40	54.00
	Attention to compliance with order for hearing on first day motions	135.00/hr	
8/10/2023	EMH	0.20	85.00
	Receipt and review of correspondence from Kevin Erskine regarding first day motions	425.00/hr	
	EMH	0.30	127.50
	Telephone call with client regarding first day motions	425.00/hr	
	EMH	0.50	212.50
	Receipt and evaluate of correspondence from Office of the United States Trustee regarding first day motions	425.00/hr	
	EMH	2.10	892.50
	Preparation regarding first day motions	425.00/hr	
8/11/2023	EMH	1.20	510.00
	Meeting with client; preparation for and attendance at hearings on first day motions	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
8/18/2023	EMH	0.30	127.50
	Telephone call with client regarding payroll issues	425.00/hr	
	EMH	0.30	127.50
	Second telephone call with counsel for Huntington regarding payroll issue	425.00/hr	
	EMH	0.70	297.50
	Formulate strategy regarding payroll issue	425.00/hr	
8/25/2023	EMH	0.30	127.50
	Telephone call with client regarding bank account issues	425.00/hr	
	EMH	0.20	85.00
	Telephone call with counsel for Huntington regarding bank account issues	425.00/hr	
8/28/2023	EMH	0.60	255.00
	Receipt and review of Motion to Lift Stay regarding GM Financial; prepare correspondence to client regarding same; Receipt and review of correspondence from client regarding same	425.00/hr	
	EMH	0.20	85.00
	Telephone call with counsel for GM Financial regarding collateral	425.00/hr	
	EMH	0.20	85.00
	Receipt and review of further correspondence from GM Financial regarding motion to lift say	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence form counsel for GM Financial regarding motion to lift stay	425.00/hr	
9/5/2023	EMH	0.30	127.50
	Prepare correspondence for counsel for landlord regarding stipulation and order for adequate protection and lift of stay	425.00/hr	
	EMH	0.40	170.00
	Western; preparation of stipulation and order lifting stay on two trucks and loader	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
9/5/2023	EMH Western: preparation of stipulation and order for adequate protection for dump truck	0.30 425.00/hr	127.50
9/7/2023	EMH Receipt and review of correspondence from counsel for landlord regarding stipulation and order for adequate protection and conditional lift of stay; Strategy regarding same	0.30 425.00/hr	127.50
9/11/2023	EMH Formulate strategy regarding Caterpillar issue	0.40 425.00/hr	170.00
	EMH Receipt and review of correspondence from Caterpillar regarding lift of stay; evaluate issues surrounding same	0.40 425.00/hr	170.00
9/12/2023	EMH Prepare response regarding Caterpillar lift of stay	0.30 425.00/hr	127.50
	EMH Review of Caterpillar documentation regarding cross collateralization	0.50 425.00/hr	212.50
	EMH Preparation of proposed order for treatment of CAT financial	0.70 425.00/hr	297.50
	EMH Telephone call with client regarding bi-weekly reporting, CAT Financial and profitability	0.20 425.00/hr	85.00
9/13/2023	EMH Preparation of motion regarding assumption of executory contract	0.40 425.00/hr	170.00
	EMH Receipt and review of correspondence from client regarding violation of stay	0.20 425.00/hr	85.00
	EMH Telephone call with client regarding CAT equipment	0.40 425.00/hr	170.00
	EMH Research regarding motion to assume lease	0.50 425.00/hr	212.50

		<u>Hrs/Rate</u>	<u>Amount</u>
9/13/2023	EMH	0.50	212.50
	Prepare correspondence to CAT regarding retention of equipment and lift of stay	425.00/hr	
	EMH	0.60	255.00
	Research regarding motion to compromise claims	425.00/hr	
	EMH	0.60	255.00
	Formulate strategy regarding Caterpillar	425.00/hr	
	EMH	0.20	85.00
	Telephone call with client regarding Arlington violation of stay	425.00/hr	
9/14/2023	EMH	0.20	85.00
	Receipt and review of correspondence from client regarding issues with CAT Financial	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from Agent of Western regarding adequate protection and lift of stay	425.00/hr	
	EMH	0.30	127.50
	Modify stipulation and order to lift stay	425.00/hr	
	EMH	0.30	127.50
	Preparation of correspondence to Agent from Western regarding adequate protection and lift of stay	425.00/hr	
	EMH	0.30	127.50
	Modify stipulation and order for adequate protection	425.00/hr	
	EMH	0.40	170.00
	Preparation of correspondence to CAT Financial regarding adequate protection and lift of stay	425.00/hr	
	EMH	0.40	170.00
	Prepare correspondence to CAT Financial regarding lift of stay and adequate protection	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from Western regarding treatment of collateral	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
9/19/2023	EMH	0.30	127.50
	Telephone call with client regarding automatic stay	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence regarding stipulation for adequate protection with Western	425.00/hr	
	EMH	0.30	127.50
	Review and revise stipulation and order to lift stay and adequate protection	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from western regarding stipulation and orders for lift of stay and adequate protection	425.00/hr	
	EMH	0.30	127.50
	Preparation of correspondence to agent of Western regarding lift of stay and adequate protection	425.00/hr	
9/20/2023	EMH	0.20	85.00
	Receipt and review of correspondence from agent of Western regarding adequate protection	425.00/hr	
	EMH	0.20	85.00
	Preparation of correspondence to agent of Western regarding revised lift of stay and adequate protection	425.00/hr	
	EMH	0.30	127.50
	Review and revised stipulation and order to lift stay and adequate protection regarding counsel language	425.00/hr	
9/21/2023	EMH	0.30	127.50
	Receipt and review of correspondence regarding lift of stay for Western	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of correspondence from client regarding United States Trustee's issues	425.00/hr	
9/28/2023	EMH	0.20	85.00
	Another call with client regarding Office of the United States Trustee request	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
10/10/2023	EMH Preparation of correspondence to client regarding adequate protection issues with Caterpillar	0.40 425.00/hr	170.00
11/1/2023	EMH Telephone call with Mr. Kahn regarding compromise of claims against the Debtor	0.30 425.00/hr	127.50
	EMH Receipt and review of preparation of motion to compromise regarding Powers claims	0.70 425.00/hr	297.50
11/2/2023	EMH Preparation regarding Motion to Compromise Claims with Powers	1.10 425.00/hr	467.50
11/3/2023	EMH Preparation of correspondence to Mr. Kahn regarding Motion to Compromise	0.20 425.00/hr	85.00
11/16/2023	EMH Preparation of response regarding motion to convert	3.10 425.00/hr	1,317.50
11/27/2023	EMH Preparation regarding response to motion to convert	2.90 425.00/hr	1,232.50
	EMH Telephone call with client regarding status of case including confirmation, motion to convert and other issues	0.20 425.00/hr	85.00
11/28/2023	EMH Telephone call with Office of the United States Trustee regarding Motion to Convert and Confirmation issues	0.30 425.00/hr	127.50
	EC Review and revise response and brief in opposition to Office of the United States Trustee motion to convert	1.30 425.00/hr	552.50
	EMH Preparation regarding response to Motion to Convert	2.10 425.00/hr	892.50
11/29/2023	EMH Telephone call with Mr. Heitman regarding status of case	0.30 425.00/hr	127.50

		<u>Hrs/Rate</u>	<u>Amount</u>
11/29/2023	EMH Preparation of response to Office of the United States Trustee's Motion to convert	0.80 425.00/hr	340.00
	EMH Prepare correspondence to Mrs. Callard and Mr. Shaprio regarding ex parte motion to adjourn	0.30 425.00/hr	127.50
12/11/2023	EMH Telephone call with Trustee regarding conversion issues	0.20 425.00/hr	85.00
	EMH Telephone call with Mr. Heitmann regarding status of case; including plan feasibility, caterpillar, motion to convert	0.80 425.00/hr	340.00
12/13/2023	EMH Preparation of response regarding motion to convert	0.80 425.00/hr	340.00
12/14/2023	EMH Telephone call with client regarding motion to convert account receivable issues	0.30 425.00/hr	127.50
12/15/2023	EMH Receipt and review of correspondence from client regarding motion to convert regarding accounts receivables	0.20 425.00/hr	85.00
12/19/2023	EMH Preparation of correspondence to client regarding response to motion to convert; specifically issues regarding failure to disclose income	0.30 425.00/hr	127.50
12/27/2023	EMH Telephone call with bookkeeper regarding transfers pursuant to response to motion to convert.	0.30 425.00/hr	127.50
	EMH Preparation of response regarding motion to convert.	0.80 425.00/hr	340.00
12/28/2023	EMH Preparation of correspondence to client regarding response to motion to convert and amended statement of financial affairs.	0.30 425.00/hr	127.50
	EMH Preparation regarding response to motion to convert.	1.20 425.00/hr	510.00



		<u>Hrs/Rate</u>	<u>Amount</u>
12/29/2023	EMH Another telephone call with client regarding Motion to Dismiss; amended statement of financial affairs, plan objection	0.80 425.00/hr	340.00
1/2/2024	EMH Preparation regarding response regarding Office of the United States Trustee's motion to convert	1.30 425.00/hr	552.50
1/8/2024	EMH Preparation for hearing regarding motion to convert	0.70 425.00/hr	297.50
1/9/2024	EMH Telephone call with the Office of the United States Trustee regarding Motion to Convert and related issues	0.30 425.00/hr	127.50
1/11/2024	EMH Prepare for hearing	0.50 425.00/hr	212.50
1/12/2024	EMH Telephone call with client regarding motion to convert	0.10 425.00/hr	42.50
1/15/2024	EMH Receipt and review of correspondence from client regarding meeting regarding motion to convert	0.20 425.00/hr	85.00
	EMH Zoom with client regarding Motion to Convert issues	0.80 425.00/hr	340.00
1/16/2024	EMH Telephone call with Office of the United States Trustee regarding Motion to Convert	0.20 425.00/hr	85.00
	EMH Preparation of Motion to Convert	1.10 425.00/hr	467.50
1/22/2024	EMH Telephone call with client regarding outstanding options for hearing on Wednesday	0.40 425.00/hr	170.00
1/23/2024	EMH Travel roundtrip to court regarding hearing on Motion to Convert and Objection to Confirmation of Plan	2.90 425.00/hr	1,232.50

		<u>Hrs/Rate</u>	<u>Amount</u>
2/5/2024	EMH Receipt and review of correspondence from CATE regarding stipulation and order to surrender equipment	0.30 425.00/hr	127.50
2/6/2024	EMH Receipt and review of correspondence from client regarding stipulation and order for surrender of equipment to CAT	0.20 425.00/hr	85.00
2/8/2024	EMH Receipt and review of correspondence from Mr. Plemmons regarding CAT Equipment issues	0.30 425.00/hr	127.50
SUBTOTAL:		[ 50.60	21,389.00]
<u>Sale, Realization, and Liquidation of Estate Property</u>			
12/12/2023	EMH Receipt and review of correspondence regarding motion to sell Ford F-250	0.30 425.00/hr	127.50
12/13/2023	EMH Preparation of correspondence to client regarding motion to sell Ford F 250	0.20 425.00/hr	85.00
12/14/2023	EMH Receipt and review of correspondence to client regarding sale of 2016 pick up truck	0.20 425.00/hr	85.00
	EMH Finalize motion to sell Ford F 250	0.30 425.00/hr	127.50
12/21/2023	EMH Receipt and review of correspondence from client regarding sale of Ford Truck	0.20 425.00/hr	85.00
12/27/2023	EMH Receipt, review and respond to correspondence from client regarding Motion to Sell.	0.20 425.00/hr	85.00
1/5/2024	EMH Receipt and review of correspondence from client regarding outstanding motion to sell	0.20 425.00/hr	85.00

		<u>Hrs/Rate</u>	<u>Amount</u>
1/16/2024	EMH Telephone call with client regarding sale of vehicle and income	0.70 425.00/hr	297.50
1/18/2024	EMH Telephone call with client regarding 363 motion to sell	0.30 425.00/hr	127.50
	EMH Telephone call with client regarding possible 363 Motion to Sell	0.40 425.00/hr	170.00
	EMH Prepare correspondence to client regarding 363 Motion to Sell	0.20 425.00/hr	85.00
1/19/2024	EMH Telephone call with client regarding potential 363 issues	0.40 425.00/hr	170.00
	EMH Further telephone call with client regarding Plan issues and 363 concerns	0.70 425.00/hr	297.50
1/22/2024	EMH Telephone call with Mr. Saad regarding settlement	0.20 425.00/hr	85.00
	EMH Telephone call with Mr. Bassel and Mr. Shapiro regarding 363 motion to sell	0.40 425.00/hr	170.00
	EMH Telephone call with Mr. Bassel and Mr. Shapiro regarding settlement	0.40 425.00/hr	170.00
	EMH Telephone call with client regarding potential settlement issues	0.40 425.00/hr	170.00
	EMH Another telephone call with client regarding potential settlement issues	0.40 425.00/hr	170.00
	EMH Telephone call with Mr. Bassel, Mr. Shapiro and Mrs. Callard regarding motion to sell	0.50 425.00/hr	212.50
	EMH Prepare for hearing on Motion to Sell	1.10 425.00/hr	467.50

		<u>Hrs/Rate</u>	<u>Amount</u>
1/23/2024	EMH	0.30	127.50
	Telephone call with client regarding 363 issues	425.00/hr	
	EMH	0.30	127.50
	Telephone call with client regarding 363 issues	425.00/hr	
	EMH	1.10	467.50
	Preparation regarding 363 motion to sell and related documents	425.00/hr	
	EMH	0.30	127.50
	Telephone call with Subchapter V Trustee regarding settlement	425.00/hr	
	EMH	0.30	127.50
	Another call with client regarding 363 issues	425.00/hr	
1/24/2024	EMH	0.20	85.00
	Receipt and review of correspondence from counsel for Mr. Saad regarding settlement	425.00/hr	
	EMH	0.20	85.00
	Preparation of correspondence to client regarding status of executed 363 motion to sell	425.00/hr	
	EMH	0.20	85.00
	Preparation of additional correspondence to client regarding status of executed 363 motion to sell	425.00/hr	
	EMH	0.30	127.50
	Receipt and review of executed 363 motion to sell and Asset Purchase Agreement; finalize documents	425.00/hr	
2/8/2024	EMH	0.30	127.50
	Telephone call with client regarding settlement issues	425.00/hr	
SUBTOTAL:		[ 11.20	4,760.00]
<u>Schedules/SOFA/Means Test</u>			
8/7/2023	EMH	5.00	2,125.00
	Meeting with client regarding filing of bankruptcy petition and schedules; continue preparation of same; continue preparation of first day motions	425.00/hr	

		<u>Hrs/Rate</u>	<u>Amount</u>
8/9/2023	EMH Meeting with client regarding remaining bankruptcy petition and schedules	2.50 425.00/hr	1,062.50
8/11/2023	EMH Meeting with client regarding remaining bankruptcy petition and schedules	3.80 425.00/hr	1,615.00
8/15/2023	EMH Meeting with client regarding finishing bankruptcy petition and schedules	2.10 425.00/hr	892.50
8/17/2023	EMH Preparation of 1187 declaration and exhibits	0.70 425.00/hr	297.50
	EMH Preparation regarding bankruptcy schedules	0.80 425.00/hr	340.00
8/21/2023	EMH Meeting with client regarding filing remaining schedules, declaration under 1187	3.50 425.00/hr	1,487.50
11/1/2023	EMH Telephone call with client regarding amending Schedule A/B and Statement of Financial Affairs	0.40 425.00/hr	170.00
11/2/2023	EMH Preparation of correspondence to client regarding amended Schedule F	0.20 425.00/hr	85.00
	EMH Preparation of amendments regarding schedule F	0.80 425.00/hr	340.00
11/3/2023	EMH Preparation of amended Statement of Financial Affairs regarding 2022 transfers	0.50 425.00/hr	212.50
SUBTOTAL:		[ 20.30	8,627.50]
For professional services rendered		260.20	\$108,434.00

## Additional Charges :

		<u>Qty/Price</u>	<u>Amount</u>
	<u>Expenses</u>		
8/7/2023	EMH	1	0.60
	PACER search and/or download	0.60	
8/8/2023	EMH	1	2.50
	PACER search and/or download	2.50	
8/10/2023	EMH	1	104.07
	Westlaw charges for legal research	104.07	
8/11/2023	MY	22	13.86
	Postage expense	0.63	
	MY	198	49.50
	Copies made	0.25	
	EMH	1	1.70
	PACER search and/or download	1.70	
8/15/2023	MY	26	16.38
	Postage expense	0.63	
	MY	26	6.50
	Copies made	0.25	
	EMH	1	1.70
	PACER search and/or download	1.70	
8/16/2023	EMH	1	0.30
	PACER search and/or download	0.30	
8/17/2023	EMH	1	0.70
	PACER search and/or download	0.70	
8/18/2023	EMH	1	4.80
	PACER search and/or download	4.80	
8/21/2023	EMH	1	1.00
	PACER search and/or download	1.00	

	<u>Qty/Price</u>	<u>Amount</u>
8/23/2023 EMH	1	8.90
PACER search and/or download	8.90	
8/28/2023 EMH	1	7.10
PACER search and/or download	7.10	
8/29/2023 EMH	1	3.30
PACER search and/or download	3.30	
8/30/2023 EMH	1	6.00
PACER search and/or download	6.00	
8/31/2023 EMH	1	4.80
PACER search and/or download	4.80	
9/1/2023 EMH	1	4.00
PACER search and/or download	4.00	
9/5/2023 EMH	1	4.60
PACER search and/or download	4.60	
9/6/2023 EMH	1	120.17
Westlaw charges for legal research	120.17	
9/7/2023 MY	1	8.53
Postage expense	8.53	
MY	302	75.50
Copies made	0.25	
EMH	1	3.30
PACER search and/or download	3.30	
9/11/2023 EMH	1	2.30
PACER search and/or download	2.30	
9/12/2023 EMH	1	14.20
PACER search and/or download	14.20	
9/13/2023 RS	26	16.38
Postage expense	0.63	
EMH	1	12.30
PACER search and/or download	12.30	

		<u>Qty/Price</u>	<u>Amount</u>
9/13/2023	RS	52	13.00
	Copies made	0.25	
9/14/2023	EMH	1	8.60
	PACER search and/or download	8.60	
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9/19/2023	EMH	1	2.20
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	Copies made	8.53	
	EMH	1	120.45
	Westlaw charges for legal research	120.45	
	RS	3	0.75
	Copies made	0.25	
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	PACER search and/or download	2.20	
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	PACER search and/or download	1.50	
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	PACER search and/or download	3.30	
9/25/2023	EMH	1	10.90
	PACER search and/or download	10.90	
9/26/2023	EMH	1	0.60
	PACER search and/or download	0.60	
9/27/2023	EMH	1	6.30
	PACER search and/or download	6.30	
10/3/2023	EMH	1	0.80
	PACER search and/or download	0.80	
10/9/2023	EMH	1	4.10
	PACER search and/or download	4.10	



	<u>Qty/Price</u>	<u>Amount</u>
10/11/2023 EMH	1	3.70
PACER search and/or download	3.70	
EMH	1	10.53
Westlaw charges for legal research	10.53	
10/12/2023 EMH	1	67.61
Westlaw charges for legal research	67.61	
EMH	1	0.80
PACER search and/or download	0.80	
10/13/2023 EMH	1	16.92
Westlaw charges for legal research	16.92	
10/16/2023 EMH	1	67.37
Westlaw charges for legal research	67.37	
EMH	1	0.30
PACER search and/or download	0.30	
10/20/2023 EMH	1	0.90
PACER search and/or download	0.90	
10/23/2023 EMH	1	9.15
Westlaw charges for legal research	9.15	
EMH	1	6.60
PACER search and/or download	6.60	
10/25/2023 EMH	1	0.70
PACER search and/or download	0.70	
10/30/2023 EMH	1	15.60
PACER search and/or download	15.60	
11/1/2023 EMH	1	0.70
PACER search and/or download	0.70	
11/3/2023 LDH	11	9.57
Postage expense	0.87	
LDH	198	49.50
Copies made	0.25	

	<u>Qty/Price</u>	<u>Amount</u>
11/3/2023 EMH	1	0.20
PACER search and/or download	0.20	
11/6/2023 LDH	2	4.30
Postage expense	2.15	
LDH	106	117.66
Postage expense	1.11	
LDH	52	13.00
Copies made	0.25	
LDH	2,756	689.00
Copies made	0.25	
EMH	1	13.40
PACER search and/or download	13.40	
EC	1	3.70
PACER search and/or download	3.70	
11/13/2023 EMH	1	4.30
PACER search and/or download	4.30	
11/14/2023 EMH	1	93.38
Westlaw charges for legal research	93.38	
11/16/2023 EMH	1	1.60
PACER search and/or download	1.60	
EMH	1	0.60
PACER search and/or download	0.60	
11/20/2023 EMH	1	129.64
Westlaw charges for legal research	129.64	
EMH	1	12.80
PACER search and/or download	12.80	
11/21/2023 EMH	1	2.80
PACER search and/or download	2.80	
11/22/2023 EMH	1	0.40
PACER search and/or download	0.40	

		<u>Qty/Price</u>	<u>Amount</u>
11/26/2023	EMH PACER search and/or download	1 22.00	22.00
11/27/2023	EMH PACER search and/or download	1 1.30	1.30
11/28/2023	EMH PACER search and/or download	1 3.30	3.30
11/29/2023	MY Copies made	107 0.25	26.75
	MY Copies made	2 0.25	0.50
	EMH PACER search and/or download	1 4.70	4.70
	MY Postage expense	107 0.63	67.41
11/30/2023	MY Postage expense	2 1.50	3.00
12/1/2023	EMH PACER search and/or download	1 1.40	1.40
12/6/2023	EMH PACER search and/or download	1 0.60	0.60
12/8/2023	EMH PACER search and/or download	1 3.10	3.10
12/9/2023	EMH PACER search and/or download	1 2.90	2.90
12/11/2023	EMH PACER search and/or download	1 10.90	10.90
12/12/2023	EMH Expert expenses	1 183.41	183.41
	EMH PACER search and/or download	1 1.40	1.40

	<u>Qty/Price</u>	<u>Amount</u>
12/19/2023 EMH PACER search and/or download	1 12.00	12.00
12/21/2023 EMH PACER search and/or download	1 9.50	9.50
EMH PACER search and/or download	1 2.40	2.40
12/22/2023 MY Postage expense	1 0.87	0.87
MY Postage expense	118 0.63	74.34
MY Copies made	132 0.25	33.00
12/27/2023 EMH PACER search and/or download	1 10.00	10.00
12/28/2023 EMH PACER search and/or download	1 1.40	1.40
12/29/2023 EMH Expert expenses	1 189.26	189.26
EMH PACER search and/or download	1 3.30	3.30
1/3/2024 EMH PACER search and/or download	1 7.60	7.60
1/11/2024 EMH PACER search and/or download	1 10.00	10.00
1/16/2024 EMH PACER search and/or download	1 6.80	6.80
1/17/2024 EMH PACER search and/or download	1 8.30	8.30
1/19/2024 EMH PACER search and/or download	1 5.10	5.10

		<u>Qty/Price</u>	<u>Amount</u>
1/21/2024	EMH PACER search and/or download	1 10.80	10.80
1/22/2024	EMH PACER search and/or download	1 5.30	5.30
	EMH PACER search and/or download	1 2.70	2.70
1/23/2024	MY Postage expense	1 0.64	0.64
	EC PACER search and/or download	1 0.70	0.70
	EMH PACER search and/or download	1 8.10	8.10
	MY Copies made	4 0.25	1.00
1/25/2024	EMH PACER search and/or download	1 3.70	3.70
1/31/2024	RS Postage expense	1 0.88	0.88
	EMH PACER search and/or download	1 2.20	2.20
	RS Copies made	16 0.25	4.00
	SUBTOTAL:		<u>[ 2,776.21]</u>
	Total costs		<u>\$2,776.21</u>
	Total amount of this bill		<u>\$111,210.21</u>
	Balance due		<u><u>\$111,210.21</u></u>

## EXHIBIT "5"

### BIOGRAPHICAL STATEMENT OF ATTORNEY

**Michael A. Stevenson**, admitted to Bar, 1985, Michigan. **EDUCATION:** Michigan State University (B.A. 1981); Wayne State University Law School (J.D. 1984). **MEMBER:** State Bar of Michigan; admitted to practice in Sixth Circuit Court of Appeals, the United States District Court, Eastern District of Michigan; American Bar Association; D. Augustus Straker Bar Association; Wolverine Bar Association; National Association of Bankruptcy Trustees; American Bankruptcy Institute; Consumer Bankruptcy Association; National Association of Consumer Bankruptcy Attorney. **OTHER:** Chapter 7 Bankruptcy Trustee in the United States Bankruptcy Court for the Eastern District of Michigan; *Attorney, Stevenson & Bullock, P.L.C.*

**Charles D. Bullock** admitted to Bar, 1995, Tennessee, 1996, Michigan. **EDUCATION:** University of Michigan (B.A. 1991); University of Memphis (J.D. 1995). **MEMBER:** State Bar of Michigan, State Bar of Tennessee; admitted to practice in the Sixth Circuit Court of Appeals, the United States District Court, Eastern and Western District of Michigan and Western District of Tennessee; Federal Bar Association; National Association of Bankruptcy Trustees; American Bankruptcy Institute; The Association of Insolvency and Restructuring Advisors; National Association of Consumer Bankruptcy Attorney; American Bar Association. **OTHER:** Former Contributing Editor for Norton Bankruptcy Law and Practice Treatise; Thomas M. Cooley School of Law—Adjunct Professor, Michigan Super Lawyers, 2010–2013; DBusiness Magazine Top Lawyers, 2010-2013, Clerked for the Hon. Bernice B. Donald, U.S. Bankruptcy Court, Western District, Tennessee, member of the Turnaround Management Association; *Attorney, Stevenson & Bullock, P.L.C.*

**Kimberly Bedigian**, admitted to Bar, 1996, Michigan. **EDUCATION:** University of Michigan (A.B. 1992); University of Detroit-Mercy School of Law (J.D. 1995). **MEMBER:** State Bar of Michigan; admitted to practice in United States District Court, Eastern District of Michigan; American Bankruptcy Institute; Consumer Bankruptcy Association. **CONTINUING PROFESSIONAL EDUCATION PROGRAMS TAUGHT OR ATTENDED IN THE TWO YEARS PRIOR TO THIS APPLICATION:** ABI 2013 Central States Bankruptcy Workshop, Acme, Michigan, June 14-16, 2013, 9 hours CLE; Consumer Bankruptcy Forum on Undisclosed Assets, Undervalued Assets and Compromises of Objections to Discharge Federal Bar Association, Eastern District of Michigan-Bankruptcy Section, Southfield, Michigan, April 24, 2013, 2 hours CLE; ABI 2012 Detroit Consumer Bankruptcy Conference, Detroit, Michigan, November 12, 2012, 6 hours CLE; 23rd Annual ABI Winter Leadership Conference; La Quinta, California, December 1-3, 2011, 11.25 hours CLE; 2011 ABI Consumer Bankruptcy Conference, Detroit, Michigan, November 11, 2011, 6 hours CLE; ABI/TMA 14<sup>th</sup> Annual Litigation Skills Symposium, Chicago, Illinois, May 19-22, 2015, 18.25 hours CLE, . **OTHER:** Board Certified in Consumer

Bankruptcy Law by the American Board of Certification (February 23, 2004); Attorney, Stevenson & Bullock, P.L.C.

**Ernest M. Hassan, III**, admitted to Bar, 2004 EDUCATION: University of Michigan B.A. 2001); University of Detroit-Mercy School of Law (J.D. 2004). MEMBER: State Bar of Michigan; admitted to practice in United States District Court, Eastern District of Michigan; American Bankruptcy Institute OTHER: 2012 ABI Central States Workshop, 9 hrs., Traverse City, MI June 7-10, member of the Turnaround Management Association; OTHER: *Attorney, Stevenson & Bullock, P.L.C.*

**Sonya N. Goll**, admitted to Bar, 2000, Michigan. EDUCATION: Western Michigan University (B A. 1995); Thomas M. Cooley Law School (J.D. 2000). MEMBER: State Bar of Michigan; admitted to practice in Supreme Court of the United States of America; United States Court of Appeals Sixth Circuit; United States District Court, Eastern District of Michigan; United States District Court, Western District of Michigan; Federal Bar Association; American Bankruptcy Institute; Consumer Bankruptcy Association. OTHER: 26<sup>th</sup> Annual Bankruptcy Section Seminar FBA Western District of Michigan, 7 hrs., Harbor Springs, MI August 1-2, 2014; 2014 ABI Central States Workshop, 9 hrs., Lake Geneva, WI June 12 -15, 2014; Sixth Circuit Practice Institute, Cincinnati, OH, May 6, 2014; ABI 2013 Detroit Consumer Bankruptcy Conference, Detroit, Michigan, November 11, 2013, 6.25 hrs.; 2013 ABI Central States Workshop, 9 hrs., Traverse City, MI June 13-16 2013; Consumer Bankruptcy Conference, 6 hrs., Detroit, MI, November 12, 2012; 2012 ABI Central States Workshop, 9 hrs., Traverse City, MI June 7-10; NACTT Academy/ALFN Hot Topic Legal Updates webinar – Detroit, MI 1.5 hrs., February 15, 2012; CBA/ICLE Updates, Strategies, and Judicial Insights Conference, Plymouth MI 6.5 hrs., May 11, 2012; 2011 ABI Consumer Bankruptcy Conference, November 11, 2011; 2011 ABI Central States Workshop, 9 hrs., Traverse City, MI June 9-11, 2<sup>nd</sup> Annual Consumer Bankruptcy Institute Conference, Plymouth, MI April 1, 2011 6.0 hrs.; Board Certified in Consumer Bankruptcy Law by the American Board of Certification (December 8, 2007); . OTHER: *Attorney, Stevenson & Bullock, P.L.C.*

**Elliot G. Crowder**, admitted to Bar, 2011, New York, 2011, New Jersey, 2012, Michigan. EDUCATION: Syracuse University (B.S. 2006); University of Detroit Mercy School of Law (J.D. 2010). MEMBER: State Bar of Michigan; State Bar of New York; admitted to practice in the United States District Court, Eastern District of Michigan; American Bankruptcy Institute. OTHER: 2012 ABI Central States Workshop, 9 hrs., Traverse City, MI June 7-10, member of the Turnaround Management Association; OTHER: *Attorney, Stevenson & Bullock, P.L.C.*

**Leslie D. Haas** EDUCATION: American Institute for Paralegal Studies (Paralegal Certificate). MEMBER: State Bar of Michigan, Legal Assistant Section; National

Association of Bankruptcy Trustees and Consumer Bankruptcy Association. OTHER:  
*Paralegal, Stevenson & Bullock, P.L.C.*

**Maya J. Yazbek** EDUCATION: University of Michigan – Dearborn (B.A. 2022);  
OTHER: Legal Assistant, At Law Group, PLLC (2020 to 2022); *Legal Assistant,*  
*Stevenson & Bullock, P.L.C.*



## EXHIBIT “6”

### STATEMENT OF EXPENSES

Copies	3,848 x .25	\$962.00
PACER		\$358.20
Legal Research		\$739.29
Expert Expense		\$372.67
Postage		<u>\$344.05</u>
<b>Total Expenses</b>		<b>\$2,776.21</b>